

1 Lawrence Hinkle (SBN 180551)
lhinkle@sandersroberts.com
2 Stephanie Jones Nojima (SBN 178453)
sjonesnojima@sandersroberts.com
3 Joshua R. Engel (SBN 304945)
jengel@sandersroberts.com
4 **SANDERS ROBERTS LLP**
1055 West 7th Street, Suite 3200
5 Los Angeles, CA 90017
Telephone: (213) 426-5000
6 Facsimile: (213) 234-4581

7 Attorneys for Plaintiffs,
8 **HIDDEN EMPIRE HOLDINGS, LLC;**
9 **HYPER ENGINE, LLC; AND DEON**
TAYLOR AND FOR THIRD PARTY
DEFENDANT ROXANNE TAYLOR

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

14 HIDDEN EMPIRE HOLDINGS, LLC;
15 a Delaware limited liability company;
HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual,

Plaintiffs,

V.

18 DARRICK ANGELONE, an individual;
19 AONE CREATIVE, LLC formerly
20 known as AONE ENTERTAINMENT
21 LLC, a Florida limited liability
company; ON CHAIN
INNOVATIONS, LLC, a Florida
limited liability company.

Defendants.

24 DARRICK ANGELONE, an individual;
25 AONE CREATIVE, LLC, formerly
known AONE ENTERTAINMENT
26 LLC, a Florida limited liability
company; ON CHAIN
27 INNOVATIONS, LLC, a Florida
limited liability company.

CASE NO. 2:22-cv-06515-MWF-AGR

Judge: Hon. Michael W. Fitzgerald

**PLAINTIFFS' AND CROSS-
DEFENDANT ROXANNE
TAYLOR'S INITIAL EXPERT
WITNESS DISCLOSURE, F.R.C.P.
26(A)(2)**

Complaint Filed: September 12, 2022
Trial Date: June 11, 2024

1 Counterclaimants,

2 HIDDEN EMPIRE HOLDINGS, LLC,
3 a Delaware limited liability company;
4 HYPER ENGINE, LLC; a California
5 limited liability company; and DEON
6 TAYLOR, an individual,

7 Counterclaim
8 Defendants,

9 DARRICK ANGELONE, an individual;
10 AONE CREATIVE, LLC, formerly
11 known AONE ENTERTAINMENT
12 LLC, a Florida limited liability
13 company; and ON CHAIN
14 INNOVATIONS, LLC, a Florida
15 limited liability company,

16 Third Party Plaintiffs,

17 v.

18 ROXANNE TAYLOR, an individual,

19 Third Party Defendant.

20 TO ALL PARTIES AND ATTORNEYS OF RECORD HEREIN:

21 Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs
22 HIDDEN EMPIRE HOLDINGS, LLC; HYPER ENGINE, LLC; and DEON
23 TAYLOR (“Plaintiffs”) and Third Party Defendant Roxanne Taylor hereby disclose
24 the following expert witnesses who may be used at trial to present evidence under
25 Rule 702, 703 or 705 of the Federal Rules of Evidence and Federal Rule of Civil
26 Procedure 26(a)(2)(A).

27 Erin Burke c/o Sanders Roberts LLP, 1055 West 7th Street, Suite 3200, Los
28 Angeles, California 90017, (213) 426-5000.

29 Alex Izen c/o Sanders Roberts LLP, 1055 West 7th Street, Suite 3200, Los
30 Angeles, California 90017, (213) 426-5000.

31 The report of any witness who has been retained to provide expert testimony in

1 this matter is attached hereto, as required by Federal Rules of Civil Procedure Rule
2 26(a)(2)(B). Neither Ms. Burke or Mr. Izen have offered deposition or trial testimony
3 in the past five years. Ms. Burke has authored the following publications within the
4 past ten years: October 2023 OC Lawyer “Five Personal Cybersecurity
5 Considerations for Lawyers” (link:
6 <https://www.virtualonlineeditions.com/publication/?m=15276&i=803734&p=46&ver=html5> page 45); August 4, 2023, “Mitigating AI Cybersecurity Risks from the Top
7 Down” co-author in Law360 article; 2015 “Combinatorial Fusion Analysis:
8 Applications for cyber security and e-discovery”
9 <https://research.library.fordham.edu/dissertations/AAI1600741/>. Mr. Izen has not
10 authored any publications within the past ten years.

12
13 Dated: January 22, 2024

SANDERS ROBERTS LLP

14 By: 

15 Lawrence Hinkle, Esq.
16 Stephanie Jones Nojima, Esq.
17 Joshua R. Engel, Esq.
18 Attorneys for Plaintiffs,

19 **HIDDEN EMPIRE HOLDINGS, LLC;**
20 **HYPER ENGINE, LLC; AND DEON**
21 **TAYLOR AND FOR THIRD PARTY**
22 **DEFENDANT ROXANNE TAYLOR**

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January 22, 2024

==== Findings Report for Hidden Empire Film Group

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Executive Summary

FTI Consulting, Inc. (“FTI”) was retained by Hidden Empire Film Group (“HEFG”) to support HEFG’s counsel, Sanders Roberts, LLP (“Counsel”) with civil litigation against Derrick Angelone and his company, Aone Creative, LLC (“Angelone”). FTI specifically assisted in transferring online assets from Angelone to HEFG per a preliminary injunction in the Central District of California case no. CV 22-6515-MWF signed by Judge Fitzgerald, dated September 30, 2022 (“the Injunction Order”). During its assistance with asset transfer, FTI conducted interviews of HEFG personnel and Angelone to understand context, observed account information to verify transfer status, and reviewed legal process returns provided by various service providers in response to counsel’s subpoena request(s).

During the transfer process, FTI’s primary point of contact at HEFG was Roxanne Avent Taylor (“R.A. Taylor”), who provided account access on an as-needed basis for FTI to verify transfers among other facilitation work.

FTI’s role in this process resulted in observations of apparent attempts by Angelone to delay, frustrate, and in at least one case, erase, select assets for transfer identified by the injunction order.

Detailed Findings

On or about October 3, 2022, FTI was informed by counsel that HEFG and Angelone, who had provided services to HEFG to include development and maintenance of digital content, social media marketing, and website domains, would benefit from the assistance of a knowledgeable intermediary to most expeditiously and accurately transfer online assets identified in the injunction order from Angelone to HEFG. On the same day, FTI spoke to Angelone via telephone to better understand the assets in the injunction order to arrange sensible transfer methods for each. The assets in the injunction order could be logically grouped into the following categories:

- *Domain Names*: For a modern business to have a presence on the internet – that is, for example, to have a website or use a professional, custom email address—it must purchase a *domain name* that gets *hosted*, and each of these concepts is explained next. A domain name is the method by which something on the internet can be contacted in a human friendly way. For example, by typing in the domain name [www.hiddenempirefilmgroup\[.\]com](http://www.hiddenempirefilmgroup[.]com)¹ in a web browser, one can view the website for HEFG, or can type an email to [office@hiddenempirefilmgroup\[.\]com](mailto:office@hiddenempirefilmgroup[.]com). Domain names may be purchased from various companies who sell domain names, and must be renewed for continuous use. The purchase of a domain name alone does not instantly result in an internet accessible website or email; purchasing a domain name has merely taken it off the table for others to use. In

¹ Brackets used so as not to create a hyperlink. Brackets do not appear in the domain name.

fact, domain names are commonly purchased simply to be owned and protected from others' malicious or deceiving, or unintentionally confusing, use, and not necessarily to be functional. To be functional and accessible by the internet, a domain name must be *hosted*, meaning, in the case of a website, that the files of code and graphics are stored on an internet connected computer, called a server. Because maintaining a server entails technical knowledge and attention, many businesses opt to use a hosting provider, who effectively rents its server space for companies to use to host their domain name. All internet connected computers are reachable through IP addresses; hosting providers will facilitate Domain Name System ("DNS") services, which map a domain name to an IP address, allowing the end user to visit websites and send email in a human friendly way. To put it all together, the domain "hiddenempirefilmgroup[.]com" is hosted by the hosting provider "Namecheap" who has assigned it the IP address 162.255.119.166². Hiddenempirefilmgroup.com is both a functional website and an email domain, and no one needs to know its IP address to see the website or send mail.

- ***ICANN/WHOIS:*** The Internet Corporation for Assigned Names and Numbers (ICANN) is a not-for-profit public/private partnership that plays a significant role in the stable functioning of our global internet, specifically by coordinating the Internet's naming system. As an example, ICANN coordinates the Internet's domain name system, as discussed in this declaration, whereby human friendly domain names, purchased for use from registrars, map to IP addresses on the internet. ICANN specifically coordinates contracts with registries, and coordinates and deconflicts the allocation of IP addresses, among ICANN's other responsibilities in this space. Among these additional responsibilities is maintenance of the WHOIS database. WHOIS is a database that stores the registrant information, such as name, address, phone number, and email address, for a domain name, and IP address block. This transparency of registrant information allows for accountability and investigation of domain or IP ownership.
- ***Google Workspace:*** Google Workspace is a collection of productivity tools offered by Google, which many companies use as a solution for company email, file storage, calendaring, document processing, and chatting, among other functions – that is, many of the most common functions desired once a domain name is hosted. When signing up for a Google Workspace account, a business owner enters the business' domain name to use with the Google Workspace account. Once the account is created, called a Workspace, an owner can create various "user accounts" within the Workspace for each of its employees to send and receive email, such as "JohnDoe@hiddenempirefilmgroup[.]com". Of course, in the account creation process, Google does not take the applicant's word that the applicant owns the domain name sought to be used for the Workspace account—Google has an automated procedure for a Workspace registrant to demonstrate ownership of the domain name it seeks to use for its Google Workspace account. This automated process is discussed in detail later in this report.
- ***Social Media:*** As a media production company, HEFG had an important presence on Instagram, Twitter, Youtube, and Facebook, where it shared information about upcoming films and promotional events. Social media account names, particularly Instagram and Twitter (now X), are typically referred to as "handles" that follow an "@" sign; in the case of Facebook and Youtube,

² IP addresses may change. This IP was associated with the domain on October 12, 2023.

content is accessible through a business page “URL” for example
www.facebook[.]com/examplebusinessid.

As further detailed below, as FTI attempted to facilitate the transfer of assets identified in Appendix A, a number of incidents of apparent malfeasance arose, including the following:

1. After the Injunction Order was issued, Angelone appeared to delete the Google Workspace account that he had created and administered on behalf of HEFG, and which had contained the entirety of HEFG’s business records, email contacts, and historical correspondence, resulting in a tremendous irrecoverable loss of business content for HEFG. Angelone further appeared to deny R.A. Taylor access to Google workspace in the time leading up to the Injunction Order and transfer.
2. Angelone, as stated in his March 27, 2023 declaration as part of Case 2:22-cv-06515-MWF-AGR (“Angelone’s March Declaration”) was responsible for managing HEFG’s website domains. Angelone claimed that a portion of the domain names—identified later in this report and familiarly referred to in this civil matter as the “Icelandic domains”—were not possible to transfer. Angelone claimed that though the Icelandic domains were at one time maintained within Angelone’s Namecheap account (Namecheap is both a name registrar and a hosting provider) account, the domains had expired (recall that domain names must be renewed). Angelone claimed in an email to FTI on October 3, 2022 “they were never used and we have no record of any billing to or payments from HEFG for these domains. I have attached HEFG payment invoices for August 2021 through the last paid invoice of April 2022. Otherwise we are investigating the status and location of them for when the issues is ultimately resolved.”³ However, it is important to recall the commonplace practice of holding domain names from a protection standpoint, which would be expected of a domain manager; furthermore, Angelone’s business relationship with HEFG was based on a system of invoicing HEFG, as described in his declaration. As this report will later detail, these Icelandic domains appear to have been under Angelone’s control, as a legal return from Namecheap for these domains showed the account with ownership of these domains a) belonged to an apparent alias of Angelone; b) had IP connections in common with Angelone’s other accounts detailed by subpoena returns; and c) owned a domain not included in the order which Angelone had recognized control over in separate correspondence. Angelone did not reveal, and actively concealed, to FTI and counsel this Namecheap account.
3. Angelone failed to successfully transfer HEFG’s two most prolific and valuable social media accounts, specifically Instagram and Twitter. The latter was the subject of a subpoena, the return for which revealed apparent malfeasance, again suggesting Angelone had transferred the account to “Jacky Jasper”, the same alias as used in the Icelandic domain names, after the Injunction Order.

1. Google Workspace Deletion and Denial of Access

³ 2022_1003_D_FT1_AugDomains_nobillsorpayments.msg

a. Deletion of HEFG Google Workspace Account by Prior Administrator (Angelone)

As the sole identified administrator of Google Workspace, Angelone appeared to delete HEFG's Google Workspace account, resulting in a tremendous, irrecoverable loss of all HEFG's historical business content.

Angelone was the sole administrator of the HEFG Workspace Account

An administrator refers to a particular account in an environment, here, a specific user within a Google Workspace account, that can effect certain settings, changes, and actions ("administrator privileges"), that are not available to standard users. Examples of such privileges include, both generally and in the case of Google Workspace, resetting passwords and deleting accounts. The term "super administrator" refers to an administrator that has access to all possible administrator privileges. An administrator that is not a "super administrator" may have access to only certain subsets of administrator privileges.

The original creator of a Google Workspace account becomes the account's first user, and the account's "super administrator". According to information received from both R.A. Taylor and Angelone, Angelone originally set up the HEFG Workspace, using the hiddenempirefilmgroup[.]com domain, and was responsible for the Workspace's maintenance. As Angelone was the creator, Darrick@hiddenempirefilmgroup[.]com is the original "user" account of the Workspace account that had privileges of "super administrator".

In the case of HEFG's Google Workspace Account, and according to all the information provided to me, there was apparently only one super administrator – Angelone.⁴ For readability, this report will simply refer to his role as "administrator" for the remainder of this report, as HEFG did not have an elaborate structure of multiple administrators with varying privilege sets.

Angelone's sole role as administrator was documented in the Google return No. 25783578 dated January 25, 2023 ("Google return").

Angelone Fails to Fully Cooperate during Google's Automated Challenge Process to Change Account Administrators to R.A. Taylor, preventing R.A. Taylor from becoming administrator and reinstating Angelone as administrator after the Injunction Order was issued.

On or about September 7, 2022, following what HEFG and Counsel describe as souring relations with Angelone, R.A. Taylor made an email request to Google to transfer administration of the Google Workspace account to herself from its existing administrator, Angelone.⁵ As discussed earlier in this

⁴ Google return No. 25783578 dated January 25, 2023

⁵ 2022_0907_Rox_Google_Request_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_roxanne@hiddenempirefilmgroup_com_ref_00Df423Flu_5004Mtwez7_ref_.msg

report, for Google to determine the rightful owner of a Workspace account who should be allowed to change administrators, it cannot rely on emails and narratives, and instead initiates a particular “challenge” process to verify ownership.⁶ This challenge process entails a two-part demonstration to Google that the requester 1) owns the domain used by the Workspace account – in this case hiddenempirefilmgroup[.]com--which is done by entering a single line in the domain’s configuration settings within Namecheap, and 2) has detailed knowledge of the account, specifically billing information and recovery information.⁷

According to the Google return, it appears when R.A. Taylor sent her request to Google to remove Angelone, Google, attempting to verify R.A. Taylor's request, temporarily demoted the existing administrator derrick@hiddenempirefilmgroup.com, and sent its "challenge" to both R.A. Taylor and Angelone. The following is reflected in the Google return internal notes for September 6, 2023:

As discussed above, step 1 of the verification or challenge process requires access to manage the domain name on the hosting provider, which HEFG was not given until October 4, 2022. Second, as R.A. Taylor did not create or administer the Workspace account, she likewise did not have the ability to answer questions related to the Workspace account’s billing information and account recovery. It appears from an email dated September 7, 2022 that Angelone forwarded to FTI on October 5, 2022, Angelone had received a similar challenge request from Google, and that he had replied to Google with the required information.⁸

On October 5, 2022, R.A. Taylor, having recently received hiddenempirefilmgroup.com domain management access within Namecheap, successfully performed step 1 of Google's requested verification process. In coordination, FTI asked Angelone to provide the second step's account knowledge answers that only he could know, related to billing and account recovery. However, Angelone replied on the same day that he was "not so comfortable" providing the information (which for example, did not require full billing information, but only the last four digits of the credit card), and

⁶ Create the following CNAME record through your domain hosting provider: 40829326.hiddenempirefilmgroup.com points to google.com

If your hosting provider is separate from your domain registrar, make sure you are modifying the CNAME record with your hosting provider. For more information on how to create a CNAME record, please visit <https://support.google.com/a/answer/47283>. If you need assistance in creating the CNAME record, please contact your hosting provider for support.

⁷ See Appendix B

⁸ 2022_1005_D_FT1_GoogleWorkspaceAdminRevoked_EXTERNAL_RE_Google workspace.msg

that he had already separately provided it to Google “with no success”.⁹ FTI understood this statement as referring to Google’s failure to immediately reinstate Angelone as administrator after replying to the two part challenge. However, Google was specifically waiting for *R.A. Taylor* to provide this information so it could continue its investigation; Angelone’s previous submission had no bearing as the dispute was filed by R.A. Taylor, and Google needed R.S. Taylor to provide the information in order to make her administrator.

Due to Angelone’s refusal to cooperate, R.A. Taylor could not provide the information needed to complete the challenge process. On October 7, 2022, Google Workspace Support informed R.A. Taylor the challenge pieces were not provided, and according to the Google return, Angelone was reinstated as administrator to the Workspace Account. The below confirms this change in Google:

REVERTING THE DOMAIN TO THE ORIGINAL STATE ~~Deleted Temp admin~~
~~Successfully updated Primary Admin from 40829326@hiddenempirefilmgroup.com to~~
derrick@hiddenempirefilmgroup.com

HEFG’s Google Workspace Account is Deleted by the Administrator (Angelone)

On October 10, 2022, R.A. Taylor received a link to start a free trial for a Workspace account for hiddenempirefilmgroup.com, and when logged in, observed the account had been entirely deleted, though no more additional information was available, such as when it was deleted or by whom.

Google’s comments through Workspace Support, contacted when trying to recover the lost information, revealed the following notes that the deletion had been performed by the prior administrator (Angelone):

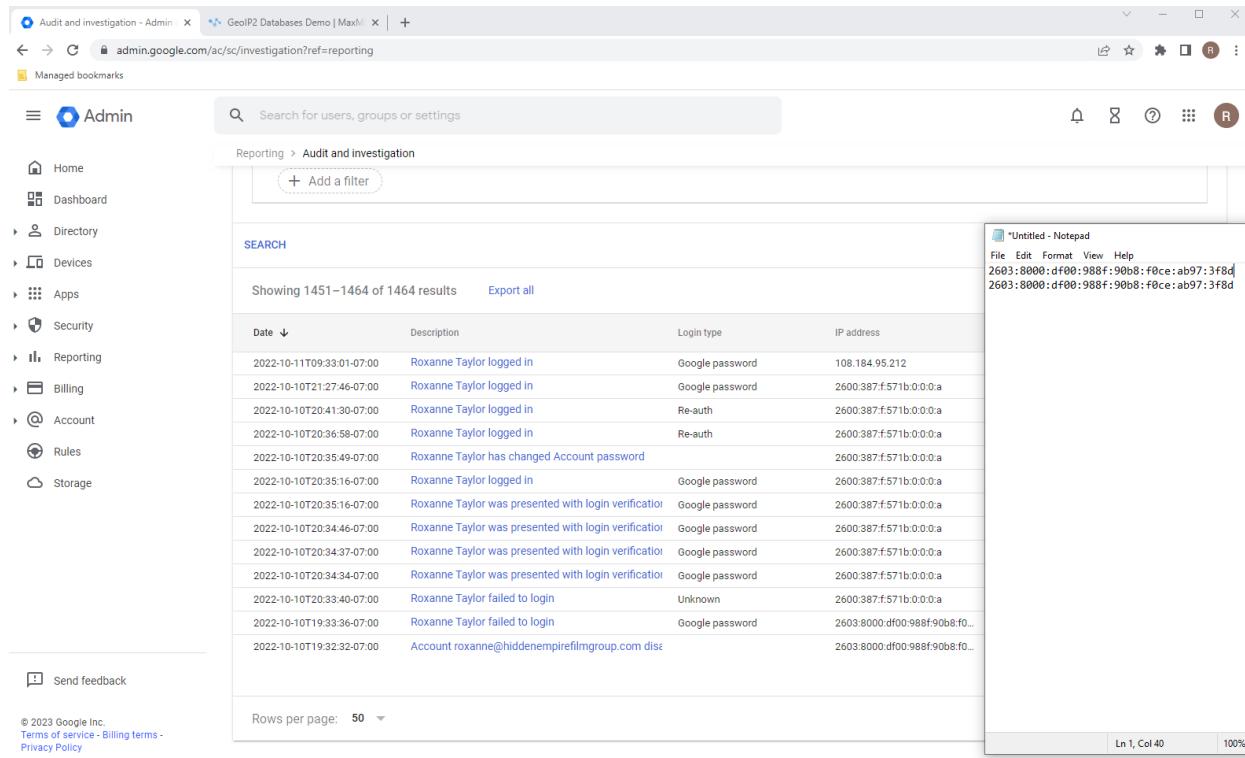
- October 27, 2022: "Since the deletion has been performed by the existing admin in workspace..."
- November 1, 2022: "Please be informed that the deletion of old account was performed by the existing super administrator and only administrator can delete the account because administrator has the all (sic) control over the Google workspace but not any user hence I would suggest you to be in touch with the existing/old admin of the previously deleted Google workspace account with the domain hiddenempirefilmgroup.com."
- November 8, 2022: "According to your other opened case 40829326 you were informed that **you were not able to prove the ownership of the domain ‘hiddenempirefilmgroup.com’** by answering the knowledge test and by adding CNAME. Therefore changes were reverted to the original state prior to sending proof of ownership request to both parties (namely you as requester and the rogue admin).**Once this account was reverted the admin deleted domain**

⁹ Email from Angelone to FTI dated October 5, 2022

and domain was released and according to my tools can see that you signed up for new domain later on the same date 10/OCT/2022." (Emphasis added)

Through the above, Google clearly states that the prior administrator (Angelone) had deleted the workspace account. Moreover, only an administrator may delete other accounts or the entire Workspace Account¹⁰, and Angelone was the sole administrator. Therefore, based on the information reviewed, no one else could have deleted the Workspace Account. R.A. Taylor in particular, according to the Google return, couldn't even successfully log into her account from August 18, 2022 until October 10, 2022, when the new account was created.

Finally, audit logs contained within HEFG's new Google workspace admin console showed that on October 10, 2022 IP address 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d, 2022-10-10T19:32:32-07:00 disabled/suspended the Roxanne[@]hiddenempirefilmgroup.com account (screenshots below):



The screenshot shows the Google Admin interface for 'Audit and investigation'. The left sidebar includes 'Home', 'Dashboard', 'Directory', 'Devices', 'Apps', 'Security', 'Reporting', 'Billing', 'Account', 'Rules', and 'Storage'. The main area is titled 'Audit and investigation' and shows a list of audit logs. The logs are filtered by 'Roxanne Taylor' and show various events from August 18, 2022, to October 10, 2022. The IP address 2603:8000:df00:988f:90b8:f0ce:ab97:3f8d is listed multiple times. A separate Notepad window is open, showing the same IP address.

Date	Description	Login type	IP address
2022-10-11T09:33:01-07:00	Roxanne Taylor logged in	Google password	108.184.95.212
2022-10-10T21:27:46-07:00	Roxanne Taylor logged in	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:41:30-07:00	Roxanne Taylor logged in	Re-auth	2600:387f:571b:0:0:0:a
2022-10-10T20:36:58-07:00	Roxanne Taylor logged in	Re-auth	2600:387f:571b:0:0:0:a
2022-10-10T20:35:49-07:00	Roxanne Taylor has changed Account password	2600:387f:571b:0:0:0:a	
2022-10-10T20:35:16-07:00	Roxanne Taylor logged in	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:35:16-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:46-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:37-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:34:34-07:00	Roxanne Taylor was presented with login verification	Google password	2600:387f:571b:0:0:0:a
2022-10-10T20:33:40-07:00	Roxanne Taylor failed to login	Unknown	2600:387f:571b:0:0:0:a
2022-10-10T19:33:36-07:00	Roxanne Taylor failed to login	Google password	2603:8000:df00:988f:90b8:f0...
2022-10-10T19:32:32-07:00	Account roxanne@hiddenempirefilmgroup.com disabled		2603:8000:df00:988f:90b8:f0...

Figure 1 Angelone IP logged into HEFG Workspace and disabling R.A. Taylor's account

An IP address, as described above, is the address identifying the source or destination of a computer sending or receiving traffic on the internet, and can be tied to an individual using such a computer by contacting the IP address provider, who maintains records for which subscriber uses a particular IP

¹⁰ To delete an entire Google Workspace account simply requires signing into admin.google.com and clicking "Delete Account" from the console menu, located within Menu > Account>Account settings>Account management.

address at a given point in time. Counsel served a subpoena on Charter Communications, the Internet Service Provider assigning this IP address, and the results showed the subscriber as “Evonne Zummo”, Angelone’s mother, and the subscriber location as Angelone’s residence. As a result, it appears Angelone was at his residence when doing this activity on Google, and that his mother pays for the residence’s internet.

This IP activity appears to overwhelmingly show Angelone denied R.A. Taylor access to the Workspace account and then deleted the Google Workspace account in violation of the injunction order, resulting in a tremendous historical information loss of all HEFG’s business operations content.

b. Angelone’s apparent attempts to deny R.A. Taylor Access to the HEFG Google Workspace Account.

Google workspace account activity suggests that Angelone was repeatedly resetting R.A. Taylor’s password through August and September 2022 in an apparent attempt to frustrate R.A. Taylor’s access, as well as other users’ access, to Google Workspace.

In interviews with FTI, R.A. Taylor had complained that she could not maintain access to her Workspace account between approximately mid to late August 2022 until when the account was closed and re-opened in October 2022. In its effort to clarify this stated difficulty, FTI reviewed user logs from the Google production. For broader context, it is important to note that only an administrator can set user password reset policies in Google Workspace, and the administrator can reset passwords, and choose to allow users to reset their own passwords, or set a rule that users need to “contact the administrator” to obtain a new password.

When a user’s attempted login is unsuccessful due to either a mistyped password or, as will be discussed below, an unknown password change by the administrator, it will be recorded as a “login_failure”, in contrast to a successful login, identified in the logs as “login_success”. If users are allowed to reset their own passwords, they may do so, and a “login_success” would appear thereafter.

While particular HEFG Google Workspace administrator account settings were not provided by Google’s return, the return did provide HEFG user logs, which illustrated the following patterns:

- R.A. Taylor did not exhibit any pattern of failed logins between May 12, 2022, the earliest log contained within the production for her account, through August 9, 2022.
- Starting on August 9, 2022 and continuing through September 22, 2022, R.A. Taylor’s account exhibits consistent and exclusive login failures each time she attempts to log into her Google Workspace Account.
- Following each failed logon, between August 9, 2022 and August 16, 2022, R.A. Taylor appears to regain access, likely through conducting her own password reset, only to have the login fail again on a subsequent date/time shortly thereafter.

- This pattern of failed login, success login, failed login, occurs until August 22, 2022, after which R.A. Taylor is unable to effect any successful login to her account.
- R.A. Taylor eventually stops trying to login all together on September 22, 2022.
- Each of R.A. Taylor's failed logins between August 9, 2023 and August 22, 2023, is shortly preceded by Angelone's login to his own user/administrator account in the Workspace account. Through this pattern of activity, Angelone appears, as administrator with the power to reset passwords during this period, to have been effecting constant password resets on R.A. Taylor's account during the time reported to FTI as the height of contention between Angelone and HEFG.

A representation of this pattern from the logs is below.

Account	IP Address	Event	Time
derrick@hiddenempirefilmgroup.com	2603:8000:df00:988f:f1b3:2443:fcf6:875e	login_success	2022-08-09 21:00:27 UTC
roxanne@hiddenempirefilmgp.com	2600:387:f:4814:0:0:0:9	login_failure	2022-08-09 21:09:11 UTC
roxanne@hiddenempirefilmgp.com	76.14.130.236	login_success	2022-08-10 01:27:30 UTC
derrick@hiddenempirefilmgroup.com	172.241.224.55	login_success	2022-08-10 02:30:02 UTC
roxanne@hiddenempirefilmgp.com	76.14.130.236	login_failure	2022-08-10 02:31:14 UTC
roxanne@hiddenempirefilmgp.com	76.14.130.236	login_success	2022-08-10 17:15:03 UTC
derrick@hiddenempirefilmgroup.com	2607:fb90:2843:9c59:866:8658:7be4:f3b4	login_success	2022-08-10 17:23:34 UTC

roxanne@hiddenempirefilmgroup.com	76.14.130.236	login_failure	2022-08-10 17:26:09 UTC
roxanne@hiddenempirefilmgroup.com	76.14.130.236	login_success	2022-08-11 21:35:31 UTC
derrick@hiddenempirefilmgroup.com	172.241.224.35	login_success	2022-08-15 17:30:13 UTC
roxanne@hiddenempirefilmgroup.com	76.14.130.236	login_failure	2022-08-15 19:43:37 UTC
roxanne@hiddenempirefilmgroup.com	76.14.130.236	login_success	2022-08-16 17:22:17 UTC
derrick@hiddenempirefilmgroup.com	192.145.119.55	login_success	2022-08-21 16:50:45 UTC
roxanne@hiddenempirefilmgroup.com	76.14.130.236	login_failure	2022-08-22 21:47:53 UTC

Furthermore, in his October 13, 2022 declaration, Angelone cited an example of the user account sean@hiddenempirefilmgroup[.]com successfully receiving emails on September 14 and September 29, 2022 “simply to illustrated that, if HEFG staff did not have access to their emails, then Sean would not have been able to set up an autoreply on his HEFG email to notify people of the new HEFG email address.”

Per the logs, though, R.A. Taylor’s account had been locked out without a successful login since August 22, 2023. FTI further observed a likelihood that Angelone reset all HEFG user accounts at once on August 8, 2022, as 7 distinct user accounts exhibited login failures that same day, starting approximately 2 minutes after Angelone’s successful login, and continuing for several days thereafter:

login_event:accounting@hiddenempirefilmgroup.cor	73.90.1.207	unknown	login_failure	2022-08-10 01:21:29 UTC
login_event:velma@hiddenempirefilmgroup.com	47.181.171.127	unknown	login_failure	2022-08-10 00:30:31 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	unknown	login_failure	2022-08-10 00:04:46 UTC
login_event:sean@hiddenempirefilmgroup.com	76.80.46.154	google_password	login_failure	2022-08-09 23:13:22 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	unknown	login_failure	2022-08-09 22:33:23 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	unknown	login_failure	2022-08-09 22:09:16 UTC
login_event:office@hiddenempirefilmgroup.com	47.181.171.127	unknown	login_failure	2022-08-09 21:55:41 UTC
login_event:erinmurray@hiddenempirefilmgroup.co	47.181.171.127	unknown	login_failure	2022-08-09 21:48:10 UTC
login_event:erinmurray@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-09 21:34:12 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-09 21:26:15 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	google_password	login_failure	2022-08-09 21:25:19 UTC
login_event:roxanne@hiddenempirefilmgroup.com	2600:387:f:4814:0:0:0	google_password	login_failure	2022-08-09 21:09:11 UTC
login_event:velma@hiddenempirefilmgroup.com	47.181.171.127	google_password	login_failure	2022-08-09 21:05:27 UTC
login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	google_password	login_failure	2022-08-09 21:05:21 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	google_password	login_failure	2022-08-09 21:03:03 UTC
login_event:accounting@hiddenempirefilmgroup.cor	2603:3006:102e:67	google_password	login_failure	2022-08-09 21:02:27 UTC
login_event:derrick@hiddenempirefilmgroup.com	2603:8000:df00:98	google_password	login_success	2022-08-09 21:00:27 UTC

In continuation, the only successful logins on August 10, 2022, was Angelone's account.

login_eve	velma@hiddenemp	2600:387:8:5:0:0:0	google_password	login_failure	2022-08-10 02:24:29 UTC
login_eve	velma@hiddenemp	2600:387:8:5:0:0:0	google_password	login_failure	2022-08-10 02:28:20 UTC
login_eve	derrick@hiddenem	172.241.224.55	google_password	login_success	2022-08-10 02:30:02 UTC
login_eve	roxanne@hiddene	76.14.130.236	google_password	login_failure	2022-08-10 02:31:14 UTC
login_eve	accounting@hidd	73.90.1.207	unknown	login_failure	2022-08-10 02:41:06 UTC
login_eve	velma@hiddenem	2600:387:8:5:0:0:0	google_password	login_failure	2022-08-10 02:59:08 UTC
login_eve	velma@hiddenem	2600:387:8:5:0:0:0	google_password	login_failure	2022-08-10 03:01:52 UTC
login_eve	derrick@hiddenem	172.241.224.54	google_password	login_success	2022-08-10 14:19:24 UTC
login_eve	accounting@hidd	73.90.1.207	unknown	login_failure	2022-08-10 14:24:04 UTC
login_eve	velma@hiddenem	2600:387:8:f:0:0:0	unknown	login_failure	2022-08-10 14:40:29 UTC
login_eve	velma@hiddenem	2600:387:8:f:0:0:0	google_password	login_failure	2022-08-10 14:41:08 UTC
login_eve	velma@hiddenem	2600:387:8:f:0:0:0	google_password	login_failure	2022-08-10 14:46:45 UTC
login_eve	derrick@hiddenem	172.241.224.54	google_password	login_success	2022-08-10 16:27:51 UTC
login_eve	derrick@hiddenem	2607:fb90:2843:9c5	google_password	login_success	2022-08-10 17:23:34 UTC
login_eve	roxanne@hiddene	76.14.130.236	google_password	login_failure	2022-08-10 17:26:09 UTC
login_eve	roxanne@hiddene	76.14.130.236	google_password	login_failure	2022-08-10 17:26:20 UTC
login_eve	roxanne@hiddene	76.14.130.236	google_password	login_failure	2022-08-10 17:26:53 UTC
login_eve	accounting@hidd	2603:3006:102e:67	unknown	login_failure	2022-08-10 17:36:16 UTC
login_eve	accounting@hidd	2603:3006:102e:67	unknown	login_failure	2022-08-10 17:36:41 UTC
login_eve	roxanne@hiddene	76.14.130.236	google_password	login_failure	2022-08-10 17:48:06 UTC
login_eve	sean@hiddenempi	47.181.171.127	unknown	login_failure	2022-08-10 20:06:37 UTC
login_eve	sean@hiddenempi	47.181.171.127	unknown	login_failure	2022-08-10 20:09:08 UTC
login_eve	velma@hiddenem	47.181.171.127	unknown	login_failure	2022-08-10 22:16:34 UTC

While some of the users appeared to effect a password reset as R.A. Taylor did, those users, like R.A. Taylor, are ultimately faced again with a failed logon after doing so during this time period in mid August between August 9, 2022 and August 15, 2022. For example, users sean and Rtaylor_asst appear to effect resets on August 11, 2022, but they are again met with login failures on August 12, after a successful login from Angelone:

login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	unknown	login_failure	2022-08-15 19:10:07 UTC
login_event:darrick@hiddenempirefilmgroup.com	172.241.224.35	google_password	login_success	2022-08-15 17:30:13 UTC
login_event:darrick@hiddenempirefilmgroup.com	76.93.225.102	google_password	login_success	2022-08-13 14:37:57 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-12 18:27:28 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-12 18:26:50 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-12 18:25:57 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_failure	2022-08-12 18:24:52 UTC
login_event:darrick@hiddenempirefilmgroup.com	2603:8000:df00:98&	google_password	login_success	2022-08-12 15:08:30 UTC
login_event:sean@hiddenempirefilmgroup.com	75.82.12.188	reauth	login_success	2022-08-12 06:27:55 UTC
login_event:sean@hiddenempirefilmgroup.com	75.82.12.188	reauth	login_success	2022-08-12 06:11:42 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	2603:8000:7f40:a81	google_password	login_success	2022-08-12 03:50:05 UTC
login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	google_password	login_success	2022-08-11 23:14:15 UTC
login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	google_password	login_success	2022-08-11 23:01:53 UTC
login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	google_password	login_success	2022-08-11 22:57:59 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	google_password	login_success	2022-08-11 22:40:18 UTC
login_event:rtaylor_asst@hiddenempirefilmgroup.co	47.181.171.127	unknown	login_failure	2022-08-11 18:40:49 UTC
login_event:darrick@hiddenempirefilmgroup.com	2603:8000:df00:98&	google_password	login_success	2022-08-11 18:19:06 UTC
login_event:darrick@hiddenempirefilmgroup.com	2603:8000:df00:98&	google_password	login_success	2022-08-11 04:35:33 UTC
login_event:sean@hiddenempirefilmgroup.com	47.181.171.127	unknown	login_failure	2022-08-10 20:09:08 UTC

Ultimately, though, these other users do have successful logins to their accounts following August 16, 2023, but given the password difficulties, HEFG had switched to a new domain not under Angelone's control.

Angelone had no failed logons on his account throughout August and September 2022.

2. Angelone failed to reveal, and actively concealed, his control of the Icelandic Domains identified in the Injunction Order.

Angelone apparently was in control of numerous domains in the injunction order previously defined as the "Icelandic domains".

Among the domains for transfer identified in the injunction order were the following Icelandic domains:

- Hiddenempiremediagroup.com
- Hiddenempiremedia.com
- Hiddenempirereleasing.com
- Hiddenempireproductions.com
- Hiddenempire.productions
- Hiddenempire.media
- Hiddenempiremedia.group
- Hiddenempire.studio
- Hiddenempire.org

According to Angelone's declarations and consistent with conversations with R.A. Taylor, Angelone's work as the website domain manager for HEFG entailed maintaining domains and invoicing

accordingly. According to an email from Angelone to FTI dated October 4, 2022, the Icelandic domains were “registered in Aug 2021, not used by HEFG not billed to or paid for and allowed to expire last month. They are currently not held in our namecheap account preventing me from being able to transfer/provide access as ordered. We are still investigating this and would welcome any feedback or help if you have tracked anything in their regards.”¹¹

Later, on October 5, 2022, Angelone similarly states, “And these were registered by hefg to consider using as expressed when registration had been communicated. But there is no record of them wanting to use, them being billed for or them paying for these domains which we let expire in August. Again, not sure how to show that these are not held in our domain registry. We made the who.is info open on all the disputed domains we do have control over. Your expertise would be appreciated on this. Thank you.”¹²

On October 13, 2022, Angelone told FTI that he found out more about the Icelandic domains: “After contacting the address shown on the privacy guard requesting details about the current registered owner, we have determined that a company who we are familiar with and who routinely registers domains recently expired from us and other vendors, registered these domains and a score of others that had expired recently and are not subject of this litigation. I nor AOne have any interest in this company and have no way to force them to transfer the domains to AOne or to HEFG. Please let me know if I can provide further assistance. Thank you.”¹³

When Angelone was asked on October 13, 2022 by FTI to provide his email outreach for our review, Angelone said “Contact was made to privacy email via a 3rd party that handles some tech related things for me, and he is based in Croatia. Otherwise, i am waiting to speak to them, and when I do I will request that an email be sent to me confirming/detailing their ownership. As much as I hope to achieve this, I have some worry they might not want to be dragged into litigation over a domain they properly registered. It is a priority for me though.”¹⁴

All the while, however, according to information returned from a subpoena to Namecheap, the hosting provider for these domains, show that those nine domains were registered by Angelone using one of his aliases, “Jacky Jasper,” with the email address of “jackyjasper@gmail.com” on or about August 6, 2021, and contrary to Angelone’s representations did not expire in August 2022, because there are no entries indicating any account transfers and/or domain expirations in 2022. The Namecheap returns further indicate that each of these domains were set to auto-renew. Upon receiving the Namecheap Return, I consulted the WHOIS database for further details on account activity for the Icelandic

¹¹ 2022_1004_D_FTI_DomainsNotinNamecheap_RE EXTERNAL RE Follow up.msg

¹² 2022_1005_D_FTI_icelandicdomains2_EXTERNAL_RE_domains transferred.msg

¹³ 2022_1013_ExpiredDomains_EXTERNAL_expired domains statuses.msg

¹⁴ 2022_1013_Croatia_Re_EXTERNAL_expired domains statuses.msg

Domains. Each of those histories corroborates the Namecheap returns by indicating that each corresponding domain was renewed in early July, 2022.

Part of Namecheap's production is a Domain List that appears to identify each of the domains registered in the "Jacky Jasper" Namecheap account. That list includes a domain named Aventviii.com that was registered on February 7, 2021. I recognized the name of that domain because R.A. Taylor asked me to help her retrieve it from Angelone as part of the domain transfer process despite it not being included in the Injunction Order. This is evidenced by an October 14, 2022, email between Angelone and me where I asked him "regarding the omission of the aventviii.com domain from the order, will you be transferring or sharing the domain via Namecheap?" and to which he replied "We are only addressing items listed in the order. This is not one. Thank you."

Ultimately, Angelone did agree to share administrative control of the aventviii.com domain with R.A. Taylor, as reflected in a November 22, 2022 email he sent me with the subject line "aventviii.com access control" confirming our telephone discussion earlier that day where he agreed to provide shared access to R.A. Taylor. Angelone would not have been able to provide shared administrator control of to the aventviii.com domain unless he had the ability to both access and control the "Jacky Jasper" Namecheap account where the Aventviii.com domain and the Icelandic Domains were all held.

Angelone has a well-documented and long-standing history of using "Jacky Jasper" as an alias and/or working in concert with others also using that alias, as detailed in FTI's Report on Social Media monitoring.¹⁵

3. Angelone failed to transfer the two most important Social Media Accounts for HEFG, and legal process returns demonstrated that Angelone had or directed control of at least one of those accounts, despite his assertions to the contrary.

Angelone failed to successfully transfer HEFG's two primary social media accounts

Angelone did not successfully transfer two social media accounts, which accordingly to R.A. Taylor were the two most important to HEFG's business and branding, specifically: Twitter @hiddenempirefg, and Instagram @hiddenempirefilmgroup.

The Twitter account was later identified in a legal return from Twitter that the account was held in the name, "Jacky Jasper," an alias used by Angelone and the same name that held the Namecheap account that registered the Aventviii.com and Icelandic domains. The Twitter return further revealed an IP login to the Twitter account that was the same IP address used to access the

¹⁵ <https://www.nytimes.com/2016/01/06/arts/television/the-path-to-charlie-sheens-hiv-disclosure.html>,
<https://www.lipstickalley.com/threads/chasity-danelle-james-doesnt-understand-why-jacky-jasper-and-derrick-angelone-wont-leave-her-alone.389198/>, FTI Report on Social Media Monitoring

derrick@hiddenempirefilmgroup[.]com account and the Namecheap account containing the Icelandic domains. This IP address is furthermore an LA-based IP address provided by Spectrum.

TWITTER (since rebranded to “X”): @hiddenempirefg

Angelone’s initial reply on October 5, 2022 to FTI concerning transfer of the @hiddenempirefg account stated the account had been suspended for copyright issues.¹⁶ When asked about this further on October 11, 2022, specifically to produce the suspension notification from Twitter, Angelone responded he wasn’t aware of any notification from Twitter and provided the following screenshot:



Figure 2 Screenshot provided in email from Angelone to FTI on October 11, 2022

When FTI asked Angelone for the password on the same day, the one provided did not work. In response, Angelone said “Try a reset. It’s been a long time. A lot of these accounts were not active or had bots/automation posting.”¹⁷

However, FTI could not conduct a password reset because Angelone would not provide a valid email or phone connected with the account, which was needed for a password reset, when asked on October 11, 2022.¹⁸

¹⁶ 2022_1005_D_FT1_Initial_EXTERNAL RE Social media follow up.msg

¹⁷ 2022_1011_TryaReset_Twitter_D_FT1_Re__EXTERNAL__RE_Twitter suspension.msg

¹⁸ 2022_1011_TwitterAutomatedBots_D_FT1_Re__EXTERNAL__RE_Twitter suspension.msg

Meanwhile, a separate team within FTI had been retained to monitor HEFG's social media accounts, parallel to FTI's work on facilitating account transfers, and that work, detailed in a separate report, revealed an apparent and public takeover of HEFG's Twitter account, ostensibly attributed to Angelone.¹⁹

According to the Twitter return received on or about April 14, 2023, the account associated with the username and handle @hiddenempirefg showed a creation date 2023-01-12T00:41:10.121Z with email *jacky.jasper@gmail[.]com*. Jacky Jasper is the same pseudonym used to hold the HEFG Icelandic domains, referenced earlier in this report. Also, one of the logins to the Twitter account less than 24 hours after it was created ("2023-01-12T19:09:06.000Z") came from the IP address "76.167.147.254", which matches an IP address used to log into Darrick's workspace account (darrick@hiddenempirefilmgroup.com) observed in the Google return, as well as an IP address used to log into the Namecheap account receiving the Icelandic domains, suggesting Angelone may in fact have had access, and continued to access the Twitter account after the Injunction Order, and did not turn it over.

Google logins demonstrating use of IP address 76.167.147.254:

login_event:darrick@hiddenempirefilmgroup.com	76.167.147.254	google_password.login_success	2022-08-17 00:29:34 UTC
login_event:darrick@hiddenempirefilmgroup.com	76.167.147.254	google_password.login_success	2022-08-16 23:12:38 UTC
login_event:darrick@hiddenempirefilmgroup.com	76.167.147.254	google_password.login_success	2022-08-16 16:53:41 UTC
login_event:darrick@hiddenempirefilmgroup.com	76.167.147.254	google_password.login_verification	2022-08-16 16:53:41 UTC

Namecheap Logins for the user "jackyjasper" using the same IP address 76.167.147.254:



Date	Success	Username	IP Address
9/22/2022 2:05:30 AM	True	jackyjasper	76.167.147.254
9/22/2022 12:02:24 AM	True	jackyjasper	76.167.147.254
9/21/2022 9:07:50 PM	True	jackyjasper	76.167.147.254

Twitter Return information provided for the Twitter account, showing *jacky.jasper@gmail[.]com* and IP address 76.167.147.254:

¹⁹ See FTI's Social Media Monitoring Report

```
{  
  "account" : {  
    "accountId" : "1613335181120933888",  
    "createdAt" : "2023-01-12T00:41:10.121Z",  
    "email" : "jacky.jasper@gmail.com",  
    "createdVia" : "oauth:3033300",  
    "username" : "hiddenempirefg",  
    "accountDisplayName" : "hiddenempirefg"  
  }  
}  
  
{  
  "ipAudit" : {  
    "accountId" : "1613335181120933888",  
    "createdAt" : "2023-01-12T19:09:06.000Z",  
    "loginIp" : "76.167.147.254"  
  }  
},
```

Instagram: @hiddenempirefilmgroup

Angelone provided a successful username and password credential set to access this account. However, many modern accounts are protected by “two factor” or “multi factor” authentication (“2FA”). 2FA is a mechanism, typically an email address, a cell phone number, or an authenticator app, that is used in addition to a username and password to receive a code which must be entered in addition to a username and password in order to protect an account in the event of credential set compromise. For this reason, when a new device, such as a new computer, logs into an account, the 2FA may be used to “verify” this new device is permitted. In the case of the Instagram account, when FTI attempted to test the provided username and password, it was met with a prompt that a verification email with a confirmation code was sent to “s*****@h*****.com”. Angelone was unable to identify this email address for FTI.

In an email dated October 11, 2022, Angelone claims he had not logged into the Instagram account since providing account credentials on September 30, 2022, and further claimed that on October 11, 2022, he received a similar verification email sending a confirmation code to the same unknown email.²⁰

Angelone claimed in a conversation with FTI on October 13, 2022, memorialized via email²¹, that he received alert emails to his office@aone[.]la email account for logins to this Instagram account. Though his accessible email was connected to this account, albeit not used as the recovery account, he claimed he was unable to access or change the verification email address receiving the verification codes in order to permit access. In this manner, providing a valid username and password did not actually

²⁰ 2022_1011_InstagramVerificationCode_Re__EXTERNAL_Re_hiddenempirefilmgroup IG email recovery.msg

²¹ 2022_1013_Recap_IG_instagram hiddenempirefilmgroup.msg

result in successful access to the account. HEFG was able to work through separate channels at Instagram to recover this account to avoid the subpoena process otherwise needed to identify the verification email address placed on the account, and by whom.

Conclusion

FTI identified numerous inconsistencies between Angelone's representations in the course of asset transfer and the legal returns. These inconsistencies, and apparent deception, resulted in delays to retrieve valuable account information, and in some cases, irrecoverable deletion. A process that could have been easily resolved by mid-October 2022, took into the spring of the following year to see resolution and clarity. Legal process returns from Google, Namecheap and Twitter all demonstrate, through IP activity and registrant information, Angelone's direct ties to activity that caused Plaintiffs harm and violated the injunction order.

I reserve the right to amend this report as discovery progresses in this case, after my review of deposition testimony, and to respond to and rebut any opinions offered by experts retained by the Defendants.

Erin Burke

Erin Burke, Director FTI Consulting
Email: erin.burke@fticonsulting.com

ABOUT FTI CONSULTING

FTI Consulting is an independent global business advisory firm dedicated to helping organizations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational, and transactional.

Individually, each practice is a leader in its specific field, staffed with experts recognized for the depth of their knowledge and a track record of making an impact. Collectively, FTI Consulting offers a comprehensive suite of services designed to assist clients across the business cycle — from proactive risk management to the ability to respond rapidly to unexpected events and dynamic environments. We lead engagements in the following industries:

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- Agriculture
- Airlines & Aviation
- Automotive & Industrial
- Construction
- Energy, Power & Products
- Environmental
- Financial Services
- Healthcare & Life Sciences
- Hospitality, Gaming & Leisure
- Insurance
- Mining
- Public Sector & Government Contracts
- Real Estate
- Retail & Consumer Products
- Telecom, Media & Technology
- Transportation & Logistics

With more than 7,600 employees located in 31 countries, FTI Consulting professionals work closely with clients to anticipate, illuminate, and overcome complex business challenges and make the most of opportunities.

ABOUT FTI CYBERSECURITY

Every day, cybersecurity threats bring challenges to your organization. Addressing these challenges requires more than deploying commercial tools or off-the-shelf software. Success demands original, innovative solutions that are tailored to fit your needs – the kind of solutions that FTI Cybersecurity experts deliver for clients daily. Our solutions can instill confidence in your organization's cybersecurity posture, enabling you to manage risk while achieving your overall business goals.

FTI Cybersecurity consists of 450+ dedicated incident response and cybersecurity consultants, led by those with decades of experience at the highest levels of law enforcement, intelligence, and global private sector institutions. Our team works closely with clients to ensure their cybersecurity approach is consistent with regulatory guidance and represents best practice and can create custom scalable solutions designed to address and combat these threats proactively, while effectively and efficiently maintaining your day-to-day business operations and reputation. Working together, FTI Cybersecurity can build your organization's cybersecurity capabilities from threat detection and incident response, to risk assessment and security awareness.

Purpose

FTI Cybersecurity is engineered to synthesize cutting-edge, intelligence-led capabilities around a trusted core of comprehensive offerings. This enables us to assist clients of any size to address their most critical needs and integrate new solutions atop or alongside pre-existing policies and programs to address cyber threats. We build a safer future by helping organizations understand their own environments, harden their defenses, rapidly and precisely hunt threats, holistically respond to crises, and sustainably recover their operations and reputation after an incident. Our seasoned experts bring deep technical and practical experience to the delivery of these solutions. Our industry experience across forensic investigations, strategic communications, expert testimony, and managed network defense operations empowers FTI Consulting to meet a full range of technical needs across the globe.

Expertise

At FTI Cybersecurity, we apply our unique insight, developed through decades of experience investigating sophisticated cyber incidents, to help clients respond to incidents and enhance their information security systems. We are thoroughly familiar with the current threat environment, and have a deep understanding of the tools, techniques, and protocols attackers use to target your computer network infrastructure.

At the same time, we have an appreciation for the technical, organizational, policy, and business challenges that companies must address to identify, react to, and mitigate attacks. We use our unrivaled experience and track record of innovative thinking to provide solutions that are holistic in philosophy, practical in application, and sensitive to businesses' operational concerns.

Background

Collectively, our cybersecurity team professionals have backgrounds in:

- Law Enforcement
- National and International Security
- Finance
- Policy and Public Affairs
- Fraud Detection
- Incident Response
- Crisis Management and Disaster Recovery
- Strategic Communications
- Forensics and Litigation
- Academia and Training

Certifications

Certifications held by our professionals include:

- Certified Information System Security Professional (CISSP)
- Certified Information Security Manager (CISM)
- Certified Information Systems Auditor (CISA)
- Certified Ethical Hacker (CEH)
- Global Information Assurance Certification Certified Incident Handler (GCIH)
- Global Information Assurance Certification Security Essentials (GSEC)
- CompTIA Security+
- Chemical-terrorism Vulnerability Information (CVI) Authorized Users

KEY PERSONNEL

The following FTI Cybersecurity personnel contributed to this report:



Tracy Wilkison

Senior Managing Director

350 S. Grand Avenue, Suite 3000 - Los Angeles, CA 90071

+1 626 200 7635

tracy.wilkison@fticonsulting.com

Education

J.D., Harvard Law School
B.A., American History,
University of Maryland at
College Park

Ms. Wilkison has more than 20 years of cybersecurity, national security, litigation, and consulting experience. She advises clients on their most complicated cybersecurity challenges, from readiness and gap assessments to regulation, enforcement, incident response and complex cybersecurity investigations.

Certifications

Licensed Attorney,
California
Admitted:
U.S. District Court for the
Central District of
California
U.S. Court of Appeals for
the Ninth Circuit
The Supreme Court of the
United States

Prior to joining FTI Consulting, Ms. Wilkison served as the United States Attorney at the United States Attorney's Office of the Central District of California (USAO-CDCA), following a career of more than 22 years as an Assistant United States Attorney (AUSA). As U.S. Attorney, she was responsible for a territory of roughly 20 million people, the largest federal district in the nation. She oversaw 280 AUSAs, in addition to staff, for a total office size of more than 500 personnel. While U.S. Attorney, Ms. Wilkison supervised many of the most significant cyber-crime, public corruption, fraud, money laundering, and violent crime cases in the country.

Before being appointed to that role, Ms. Wilkison was the First Assistant United States Attorney, and as the second in command at the office, she provided support and guidance in all matters relating to the Criminal, Civil, National Security, and Tax divisions. She met regularly with Division and Section Chiefs to resolve case-related issues and develop policy, managed the investigative process forms used by criminal AUSAs, and coordinated with the United States District and Magistrate Judges.

Expertise

Legal
National Security
Cyber and Intellectual
Property

Ms. Wilkison held several other positions at the USAO-CDCA throughout her tenure, including in Cyber and Intellectual Property, as Deputy Chief of General Crimes and Complaints training the newest AUSAs, and in International Narcotics, Money Laundering and Racketeering. During her time in the Cyber and Intellectual Property unit, she was responsible for the investigation and prosecution of computer-related crimes, such as unauthorized access of computers and extortion, as well as intellectual property crimes, such as importing and selling counterfeiting goods and the theft of trade secrets. In addition to assembling extremely complicated prosecutions that identified the persons behind computer attacks, she also served as a first-level responder to victim businesses to help coordinate with law enforcement and technical experts. With this experience, she frequently worked with companies to develop and exercise incident response plans, and to educate their employees on best practices. She also served as the Ethics Officer and the Diversity Committee Co-Chair for six years.

Associations

American Bar Association
Federal Bar Association
California State Bar
Association
Women's White Collar
Defense Association
Women Lawyers Association
of Los Angeles

Ms. Wilkison holds a B.A. in American History from the University of Maryland at College Park and received her J.D. from Harvard Law School. Prior to joining the USAO-CDCA, Ms. Wilkison worked as a litigation associate at Quinn Emanuel, and as a law clerk to the Honorable Franklin Van Antwerpen, U.S. District Court, Eastern District of Pennsylvania.



Chris Pluhar

Senior Director

350 S. Grand Ave, Suite 3000 - Los Angeles, CA 90071
+1 949 291 0447
chris.pluhar@fticonsulting.com

Education

B.S., Aeronautical Engineering, U.S. Air Force Academy
M.S., IT Security & Assurance, Carnegie Mellon University

Certifications

FBI Digital Evidence Examiner
FBI Mobile Device Examiner
CompTIA A+ & Network+
RedHat Certified Engineer (RHCE)

Expertise

Cyber Incident Coordination
Cybersecurity Preparedness
Cybersecurity Policy & Compliance
Data Recovery
Digital Forensics
Incident Response
Insider Threat
Investigations
Technical Troubleshooting
Vulnerability Assessments

Mr. Pluhar has more than 25 years of experience conducting technical and complex cyber investigations and in-depth digital evidence examinations, managing incident response matters, conducting cybersecurity maturity assessments, providing expert witness testimony, and leading teams of technical personnel.

At FTI Consulting, Mr. Pluhar leads teams that perform complex cybersecurity incident response and investigations and ensure cybersecurity readiness and resilience against sophisticated cyberattacks for clients in the entertainment, energy, medical, financial, and technology sectors. Mr. Pluhar brings years of public sector cyber experience to help clients investigate and understand complex incidents and provide holistic, practical guidance to identify, understand, and mitigate risk.

Prior to joining FTI Consulting, Mr. Pluhar served 21 years as a Special Agent for the Federal Bureau of Investigation (FBI) in the San Francisco and Los Angeles offices. Mr. Pluhar is known for his ability to use innovative techniques to lead investigations, conduct digital evidence analysis, and provide expert testimony on some of the FBI's largest, high-profile, and sensitive Cyber, Counterterrorism, and Counterintelligence cases. During his FBI tenure, Mr. Pluhar was selected as the Director of the Orange County Regional Computer Forensics Laboratory (OCRCFL) which serves Orange, Los Angeles, San Bernardino, and Riverside counties. The OCRCFL is a multi-agency FBI task force responsible for digital evidence preservation, processing, analysis, investigation, and technical expert testimony for state/local and federal law enforcement agencies in the Los Angeles area.

Mr. Pluhar has significant technical, operational, and teaching experience around the world and has been honored by the U.S Attorney General, the U.S. Department of Justice, the Office of the Director of National Intelligence, and the FBI.

Prior to the FBI, Mr. Pluhar served 5 years as an Officer in the United States Air Force, leading joint Air Force and contractor teams in the design planning, negotiation, and purchase of next-generation Department of Defense satellite communications systems. After the Air Force, Mr. Pluhar worked as a spacecraft system engineer at Hughes Space and Communications, where he developed, implemented, and managed technical solutions to track and ensure compliance for spacecraft design.



Erin Burke

Director

2030 Main Street, Suite 530 - Irvine, CA 92614

+1 949 386 6333

Erin.Burke@fticonsulting.com

Education

B.A., Philosophy, Fordham University
M.S., Computer Science, Fordham University
J.D., Fordham University

Ms. Burke has 14 years of professional experience in law and program and project management, including 5 years of cybersecurity experience in confidential and complex criminal and regulatory cybersecurity investigations, specifically in insider threats and digital assets and currency, as well as maturing enterprise security programs.

Certifications

GIAC GPEN
GIAC GCIH
GCUX
GSEC

At FTI Consulting, Ms. Burke leads teams to carry out complex investigative activities, perform cybersecurity maturity assessments, and conduct regulatory compliance assessments. Recently, Ms. Burke successfully led investigative efforts that ultimately guided two clients through the evaluation of insider threat suspicion, resulting in better-informed personnel actions and M&A activity. She has worked with clients in a wide range of industries, including healthcare, media, government, and finance. Ms. Burke has managed numerous client maturity assessments for NIST and CIS frameworks.

Expertise

Complex Investigations
Cybersecurity Strategy
Project Management

Prior to joining FTI Consulting, Ms. Burke led enterprise-level criminal and national security cyber investigations at the Federal Bureau of Investigation in Los Angeles, including takedowns of major malicious cyber actors. Ms. Burke formerly practiced law in New York and New Jersey as a defense-side litigator for securities and arbitration matters. As a former litigator and Special Agent in the FBI's Cyber Division, Ms. Burke brings a wide range of experience in technical investigations focused on cyber intrusions, insider threats, and digital assets and currency.

Ms. Burke is a member of the California state bar and is GIAC certified in Linux hardening, incident handling, and penetration testing. She holds undergraduate and graduate degrees in Law and Computer Science from Fordham University.

Appendices

Appendix A: Transferred/Shared Accounts

- 1) Website backup files:
 - a. Hiddenempirefilmgroup.com website files received
 - b. Claimed no backups of the following:
 - i. Hyperengine.ai
 - ii. Bewoke.vote
 - iii. Blackhistoryintwominutes.com
 - iv. Climborganization.org
 - v. climb.network
- 2) Social Media:
 - a. Instagram
 - i. Hiddenempirefilmgroup: could not access due to verification code being sent to an unknown email; recovered independently by HEFG
 - ii. Meet_the_blacks
 - iii. blackhistoryintwominutes
 - iv. Traffikmovie
 - v. Supremacy.movie
 - vi. Be.woke.vote:
 - vii. “@Fear.movie”/“Fear”
 - b. Facebook
 - i. “Hiddenempirefilmgroup”
 - ii. “Meet the Blacks”
 - iii. “blackhistoryintwominutes”
 - iv. Traffik
 - v. [@]Supremacymovie, Supremacy
 - vi. “Be woke.vote”
 - vii. “Fear Movie”
 - viii. Climb.organization
 - c. Twitter
 - i. Hiddenempirefg: not provided
 - ii. [@]meettheblacks
 - iii. Black History in Two Minutes, [@]blkhistory2min
 - iv. Traffik
 - v. Supremacy, @Supremacy_movie
 - vi. Bewoke.vote
 - d. LinkedIn:
 - i. <https://www.linkedin.com/company/hidden-empire-film-group/> Darrick claims he was not the admin or manager of this page.
 - e. Youtube:
 - i. <https://www.youtube.com/c/HiddenEmpireFilmGroup?app=desktop>
 1. Darrick claims he did not manage this, and it was connected to a hiddenempirefilmgroup email account.

- ii. <https://www.youtube.com/blackhistoryintwominutes/>
- iii. <https://www.youtube.com/c/BeWokeVote>

3) Domains:

- a. The following domains were listed in the order, but both parties agree are moot:
 - i. Hefg.com
 - ii. 2getherwewillsavelives.com
 - iii. Climb.org
 - iv. Factsnotpolitics.com
- b. Ownership Transferred:
 - i. Hiddenempirefilmgroup.com
 - ii. Hiddenempirefilms.com
 - iii. Meettheblacksthemovie.com
 - iv. 2getherwesavelives.com
 - v. Togetherwewillsavelives.com
 - vi. Togetherwewillsavelives.org
 - vii. Factsnotpolitics.org
 - viii. Hyperengine.ai (changed from shared to released on 10/13/22)
- c. Admin Access Provided:
 - i. Fatale.movie
 - ii. Theintruder.movie
 - iii. Traffik.movie
 - iv. Traffikmovie.com
 - v. Meettheblacksmovie.com
 - vi. Thehousenextdoor.movie
 - vii. Supremacyfilm.com
 - viii. Supremacymovie.com
 - ix. Fear.movie
 - x. Freeagentsmovie.com
 - xi. Freeagents.movie
 - xii. Hoop2film.com
 - xiii. Hooptofilm.com
 - xiv. Climborganization.org
 - xv. Climb.network
 - xvi. Blackchairshow.com
 - xvii. Blackhistoryintwominutes.com
 - xviii. Bewoke.vote (listed as be.woke.vote in order)
 - xix. Hyperenginellc.com
 - xx. Aventviii.com
- d. Domains held in the name “Jacky Jasper”:
 - i. Hiddenempiremediagroup.com
 - ii. Hiddenempiremedia.com
 - iii. Hiddenempirereleasing.com
 - iv. Hiddenempireproductions.com
 - v. Hiddenempire.productions

- vi. Hiddenempire.media
- vii. Hiddenempiremedia.group
- viii. Hiddenempire.studio
- ix. Hiddenempire.org
- x. Hiddenempireentertainment.com
- xi. Hiddenempirestudios.com

Appendix B: Google Account Knowledge Questions

Please answer the following account knowledge questions:

Please try to answer all of the questions, specifying a single answer to each one. If you are uncertain about some of the answers, it's a good idea to check the inbox of the personal email address you've specified while registering the Google Workspace account, or the bank that manages the payment method you're using.

- What is the username (username@domain.com) of the Super Administrator account you are trying to access?
- When did you last sign in to this Super Administrator account (MM/DD/YYYY)?
- What is the original secondary/recovery email address?
- Why are you unable to access this secondary/recovery email address?
- How many users are on your Google Workspace account?

If you paid with a credit/debit card: (DO NOT PROVIDE COPY/SCAN OF ANY DETAILS)

- When was the last charge for this Google Workspace account (MM/DD/YYYY)?
- How much was your credit/debit card charged?
- What type of credit/debit card was charged (e.g. MasterCard, Visa)?
- What are the last four digits of this card?
- What is the expiration date of this card?
- What is the billing address associated with the Google Workspace payment method?
- If you made the transaction through Google Wallet, what is the order number?

If you paid by bank transfer: (DO NOT PROVIDE COPY/SCAN OF ANY DETAILS)

- What is the date of the most recent invoice (MM/DD/YYYY)?
- How much was your most recent bank transfer?
- What is the reference number for this transfer?
- What are the last two digits of this bank account?
- What is the billing address associated with the Google Workspace payment method?

If you paid by PayPal:

- When was the last charge for this Google Workspace account (MM/DD/YYYY)?

- How much was your PayPal account charged?
- What email is associated with the Paypal account used to pay?
- What is the ID of your last invoice?

Appendix C: Files Reviewed

GoogleReturn_matter_25783578_attachments
2022_10_05_Rox_GW_Resolve_EXTERNAL_Support # 40829326 and 41009848.msg
2022_0309_Alex_Erin_RE__EXTERNAL_RE__External_RE_Hidden Empire.msg
2022_0906_G_Rox_Challenge_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_0906_GW_D_google workspace admin priv revoked.pdf
2022_0907_Rox_Google_Request_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_1003_D_FTI_AugDomains_nobillsorpayments.msg
2022_1004_D_FTI_DomainsNotinNamecheap_RE EXTERNAL RE Follow up.msg
2022_1005_D_FTI_GoogleWorkspaceAdminRevoked_EXTERNAL_RE_Google workspace.msg
2022_1005_D_FTI_icelandicdomains2_EXTERNAL_RE_domains transferred.msg
2022_1005_D_FTI_Initial_EXTERNAL RE Social media follow up.msg
2022_1006_G_Rox_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_1007_G_Rox_NotabletoProve_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_1010_G_Rox_AccountDeleted_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_1011_GraniteBay_Instagram_D_FTI_Re__EXTERNAL_Re_hiddenempirefilmgroup IG email recovery.msg
2022_1011_InstagramVerificationCode_Re__EXTERNAL_Re_hiddenempirefilmgroup IG email recovery.msg
2022_1011_Suspension_Re__EXTERNAL_RE_Twitter suspension.msg
2022_1011_TryaReset_Twitter_D_FTI_Re__EXTERNAL_RE_Twitter suspension.msg
2022_1011_twitter_Re EXTERNAL RE Twitter suspension.msg
2022_1011_TwitterAutomatedBots_D_FTI_Re__EXTERNAL_RE_Twitter suspension.msg
2022_1013_Croatia_Re__EXTERNAL_expired domains statuses.msg
2022_1013_Declaration of Darrick Angeleone in Response to Court's Order for Preliminary Injunction.pdf
2022_1013_ExpiredDomains_EXTERNAL_expired domains statuses.msg
2022_1013_Recap_IG_instagram hiddenempirefilmgroup.msg
2022_1014_Aventviii_domain_External_.msg
2022_1122_Aventviii_com access control_External_.msg
2022_1027_G_Rox_CompletDeleted_EXTERNAL_Fwd_Google Workspace Support 40829326__rogue_ roxanne@hiddenempirefilmgroup_com _ref_00Df423Flu_5004Mtwez7_ref_.msg
2022_1109_workspacetimeline.xlsx
Angelone_Declaration.pdf
Appendix B - CHTR218186_Response_06272023185400.pdf
attch_1013_expireddomains_8.9.2021 FW_Hiddenempire.com.pdf
attch_1013_expireddomains_quincy domains-email aug 6 2021.pdf
GoogleProd 25783578 - Updated Format.pdf
HE Order.pdf
Hidden Empire Holdings - Comments.pdf

Hidden Empire Twitter Suspicious Activity.docx
WHOIS records for Icelandic Domains
hiddenempirefg-1613335181120933888-2023-02-23-20-39-48-48311412 (4).zip
matter_25783578_attachments.zip
NamecheapResponse_US01095-02 - PROCESSED RECORDS.pdf
Not_comfortable_EXTERNAL RE Google workspace.msg
sandersonRoberst_workspace_supportingDocs.zip
Text_GoogleAdmin.png
Twitter_Perla Decl - Hidden Empire.doc.pdf

January 22, 2024

==== Findings Report for Hidden Empire Film Group

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Executive Summary

FTI Consulting, Inc. (“FTI”) was retained by Hidden Empire Film Group (“HEFG”) to support HEFG’s counsel, Sanders Roberts, LLP (“Counsel”) with civil litigation against Darrick Angelone and his company, Aone Creative, LLC (“Angelone”). FTI specifically assisted in conducting regular monitoring reports across Hidden Empire properties to identify and evaluate suspicious activity related to Hidden Empire website, social accounts, and other digital channels which referenced Hidden Empire and/or affiliated parties.

Over the duration of this engagement, FTI has identified numerous incidents of suspicious, if not intentional, attempts by Angelone and/or associated parties to cause reputational damage to Hidden Empire through the use of digital outlets.

Detailed Findings

The observations and analysis pertaining to Hidden Empire properties and malicious digital activity can be grouped into two distinct categories:

- Topic 1: *Association with Hollywood Street King/Jacky Jasper and Malicious Activity*
- Topic 2: *Interference with Hidden Empire Social Media Properties*

Topic 1: Association with Hollywood Street King/Jacky Jasper and Malicious Activity

1. Angelone has established ties with online tabloid actor Hollywood Street King a/k/a “Jacky Jasper”

In 2009, musician Sean Merrick co-founded the online tabloid news website Hollywood Street King, under the pseudonym Jacky Jasper. Since then, Angelone has been connected to the character Jacky Jasper and Hollywood Street King outlet both directly and indirectly, demonstrating an established relationship between the two. In 2010, Angelone partnered with “Jacky Jasper” as executive producers on a short film titled “King of Hollywood¹”. The film was promoted on YouTube via the Angelone Entertainment YouTube channel. Subsequent media coverage on the “Jacky Jasper” character has also uncovered additional ties to Angelone, including a 2014 article in The Gawker regarding Jasper’s role in tabloid coverage, where the journalist stated “Jasper put us in touch with...a guy named Darrick Angelone”².

In 2016, The New York Times published a story around Charlie Sheen’s public announcement that he was H.I.V. positive and how the information was uncovered. In the article, it is revealed that “Jacky Jasper” played a prominent role, by improperly gaining access to confidential information and publishing this to his Hollywood Street King blog. In the article, “Jacky Jasper” credits Darrick Angelone and Aone Entertainment with the operations of the Hollywood Street King website, with the New York Times reporting “[Jacky Jasper] said that while he wrote many of the posts, the technical and business operations of the site were handled by a colleague, Darrick Angelone of AOne Entertainment. Mr. Richards said he forwarded the payments to that company”³. Not only does this illustrate Angelone’s connection to “Jacky Jasper” and the Hollywood platform – it also demonstrates his familiarity with leveraging the outlet for malicious, extortion-like tactics of prominent individuals.

¹ “Aone Productions: King of Hollywood”, 2010, (www.youtube.com/watch?v=9k6gfouyS3I)

² “Someone Has Been Pretending to Be a Racist “Kris Jenner” for Months”, *Gawker*, 2014, (www.defamer.gawker.com/kris-jenner-was-hacked-and-impersonated-heres-the-biza-1632639913) (See Appendix; Ex. A)

³ “The Path to Charlie Sheen’s H.I.V. Disclosure” (<https://www.nytimes.com/2016/01/06/arts/television/the-path-to-charlie-sheens-hiv-disclosure.html>) (See Appendix; Ex. B)



Figure 1: "King of Hollywood"; Produced by "Jacky Jasper" and Darrick Angelone

2. Hollywood Street King a/k/a “Jacky Jasper” begins sharing edited and confidential information pertaining to Hidden Empire legal proceedings

On October 29, 2022, The Hollywood Street King outlet posted an article titled “Deon & Roxanne Taylor’s Hidden Empire Film Group Sued For Multiple Counts of Fraud”⁴. The post contained images and text of court filings regarding Angelone’s countersuit. On November 1, 2022, The Hollywood Street King website posted an edited video of Deon under the title “Director Deon Taylor Chimes In On Jada Smith’s Toxicity & Will Smith and Chris [Rock]”. The article is attributed to “Jacky Jasper”⁵ and was updated again on March 1, 2023. The embedded video was a falsified clip that edited and stitched together various segments of a conversation by Deon. Without further context, it misconstrued Deon’s original comments and intentionally mislead viewers in an apparent attempt to create negative perceptions around Deon and Hidden Empire. Most notably, this footage was improperly taken from Hidden Empire email servers – including personal and private emails and zoom content – after Mr. Angelone’s access was legally prohibited. At minimum, the preliminary injunction from September 30th, 2022 should have prohibited access to, and usage of, such content. Moreover, Mr. Angelone has previously stated that all access and information from such servers had been deleted, and therefore the usage of this content would indicate that the contents had been preemptively downloaded and/or saved elsewhere with the intention of future deployment. This video was later posted to social media accounts associated with Hollywood Street King and Jacky Jasper on Instagram, YouTube⁶, and Twitter (now X).

⁴ “Deon & Roxanne Taylor’s Hidden Empire Film Group Sued for Multiple Counts of Fraud” www.hollywoodstreetking.com/deon-roxanne-taylors-hidden-empire-film-group-sued-for-multiple-counts-of-fraud/ (See Appendix; Ex. C)

⁵ “Director Deon Taylor Chimes in on Jada Smith’s Toxicity & Will Smith and Chris Rock’s Masculinity” www.hollywoodstreetking.com/director-deon-taylor-dishes-on-jada-smith-toxicity-will-smith-chris-rocks-masculinity/ (See Appendix; Ex. D)

⁶ www.youtube.com/watch?v=p2erfnzm6ZE&embeds_referring_euri=https%3A%2F%2Fhollywoodstreetking.com%2F&source_ve_path=MjM4NTE&feature=emb_title

3. Hollywood Street King a/k/a “Jacky Jasper” escalates campaign against Deon and Hidden Empire

On February 17, 2023, Hollywood Street King published another edited video on Twitter (now X)⁷ of Deon Taylor in another apparent attempt to negatively shape public perception of Deon and Hidden Empire. This cadence continued over the following months; accordingly, the volume of content published by Hollywood Street King/Jacky Jasper pertaining to Deon Taylor/Hidden Empire is notably higher than any other topic covered by the outlet. The articles also tend to reuse the same topics and videos multiple times, frequently referring to improperly obtained video footage as a “zoom leak”. The tactics most often involved an article published to Hollywood Street King with an associated video, on the dates outline below:

- **March 1:** “Director Deon Taylor Chimes In On Jada Smith’s Toxicity & Will Smith And Chris Rock’s Masculinity!”⁸
- **March 29:** Deon & Roxanne Taylor’s Hidden Empire Film Group Sued For Multiple Counts Of Fraud⁹
- **May 31:** “Hidden Empire’s Troubling Connections And Litigation Nightmare”¹⁰
- **August 7:** Jacky Jasper Shared Another Deon Video Via Twitter (Now X)¹¹
- **August 11:** “Jacky Jasper Share Another Court Filing, Article Titled, “Deon And Roxanne Taylor Ordered To Answer The Numerous Claims Filed Against Them By Former Partner”¹²
- **August 22:** “Deon Taylor Exposed: The ‘Fake Friend’ In Jamie Foxx’s Scandalous Post”¹³
- **September 18:** Hollywood Street Kings Shares Another YouTube Video “Deon Taylor’s King Bach Zoom Pitch Disaster, Ignorance On Full Display!”¹⁴

⁷ <https://twitter.com/hwdstreetking/status/1626678672072531968> (See Appendix; Ex. E)

⁸ “Director Deon Taylor Chimes in on Jada Smith’s Toxicity & Will Smith and Chris Rock’s Masculinity”

<https://hollywoodstreetking.com/director-deon-taylor-dishes-on-jada-smith-toxicity-will-smith-chris-rocks-masculinity/> (See Appendix; Ex. D)

⁹ “Deon & Roxanne Taylor’s Hidden Empire Film Group Sued for Multiple Counts of Fraud”

<https://hollywoodstreetking.com/deon-roxanne-taylors-hidden-empire-film-group-sued-for-multiple-counts-of-fraud/> (See Appendix; Ex. C)

¹⁰ “Hidden Empire’s Troubling Connections and Litigation Nightmare” <https://hollywoodstreetking.com/hidden-empires-troubling-connections-and-litigation-nightmare/> (See Appendix; Ex. F)

¹¹ https://twitter.com/hwdstreetking/status/1688643063332364288?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1688643063332364288%7Ctwgr%5E6a568949f11e0541b4b54af1af84e1a237e721ab%7Ctwcon%5Es1_%&ref_url=https%3A%2F%2Fhollywoodstreetking.com%2Fdeon-taylor-exposed-the-fake-friend-in-jamie-foxxs-scandalous-post%2F (See Appendix; Ex. G)

¹² “Deleon and Roxanne Taylor Ordered to Answer the Numerous Claims Filed Against Them by Former Partner” <https://hollywoodstreetking.com/deon-and-roxanne-taylor-motions-to-dismiss-denied-must-answer-complaint/> (See Appendix; Ex. H)

¹³ “Deon Taylor Exposed: The ‘Fake Friend’ in Jaime Foxx’s Scandalous Post”

<https://hollywoodstreetking.com/deon-taylor-exposed-the-fake-friend-in-jamie-foxxs-scandalous-post/> (See Appendix; Ex. I)

¹⁴ “Deon Taylor’s King Back Zoom Pitch Disaster, Ignorance on Full Display”

<https://hollywoodstreetking.com/deon-taylors-king-bach-zoom-pitch-disaster/> (See Appendix; Ex. J)

- **September 26:** “Deon Taylor’s Unfiltered Take On Tyrese’s Social Media Skills | HSK Exclusive¹⁵”
- **September 28:** “Leaked Audio Exposé: Deon Taylor And King Bach’s Dubious Pasts Unveiled”¹⁶; *This Article Was Also Published With The Tag “Bad Person.”*
- **September 29:** “In Leaked Audio Caleeb Pinkett Reveals: Will Smith & Kevin Hart’s Hollywood Power Dynamics”¹⁷
- **October 2:** “Deon Taylor’s Wild R. Kelly Instagram Theory – Pedophilia Populism?”¹⁸
- **October 3:** “Inside The Zoom Leak: Will Smith’s Race To Outshine The Rock & Kevin Hart”¹⁹

The image is a screenshot of a news article from 'Hollywood Street King'. At the top, there is a black header bar with the text 'Hollywood Street King' on the left and 'GOT A TIP?? - EARN CA\$H!!' on the right. Below the header, there are three black buttons with white text: 'BAD PEOPLE', 'HIDDEN EMPIRE FILM GROUP', and 'HOLLYWOOD STREET KING EXCLUSIVE'. The main title of the article is 'LEAKED AUDIO EXPOSÉ: DEON TAYLOR AND KING BACH'S DUBIOUS PASTS UNVEILED' in large, bold, black capital letters. Below the title, the author is listed as 'By Jacky Jasper - Sep 28, 2023'.

Figure 2: Hollywood Street King Article, 9/28; includes article tag of "Bad Person"

More so, “Jacky Jasper” sent these videos to colleagues of Deon and notable industry figures (including Damian Douglass, Tyron Turner, and Omar Joseph) to further brandish his reputation, impacting his ability for future earnings and future production efforts as one of the most prominent independent producers in Hollywood. As a result, Deon had to take time from his professional efforts to reach out and speak with various recipients of these videos to maintain his relationship and ensure they knew the origin of the video and the sender’s intent. This was most prominent when a video was sent directly to actor Will Smith during the premier of his film “Emancipation” – an event that Deon was attending as well. Accordingly, Deon was forced

¹⁵ “Deon Taylor’s Unfiltered take on Tyrese’s Social Media Skills” <https://hollywoodstreetking.com/deon-taylor-tyrese-trash-talk/> (See Appendix; Ex. K)

¹⁶ “Leaked Audio Expose: Deon Taylor and King Bach’s Dubious Pasts Unveiled” <https://hollywoodstreetking.com/leaked-audio-expose-deon-taylor-and-king-bachs-dubious-pasts-unveiled/> (See Appendix; Ex. L)

¹⁷ “In Leaked Audio Caleeb Pinkett Reveals: Will Smith & Kevin Hart’s Hollywood Power Dynamics” <https://hollywoodstreetking.com/will-smith-kavin-hart-leaked-caleeb-pinkett-reveal/> (See Appendix; Ex. M)

¹⁸ “Deon Taylor’s Wild R. Kelly Instagram Theory – Pedophilia Populism?” <https://hollywoodstreetking.com/deon-taylors-wild-r-kelly-instagram-theory-pedophilia-populism/> (See Appendix; Ex. N)

¹⁹ “Inside the Zoom Leak: Will Smith’s Race to Outshine the Rock & Kevin Hart” <https://hollywoodstreetking.com/zoom-leak-will-smith-vs-the-rock-kevin-hart/> (See Appendix; Ex. O)

to take time away from the event to discuss the incident, which could have potentially upended the event and a critical and longstanding relationship between Deon and Will Smith.

Overall, the Jacky Jasper and affiliated accounts have shown a unique interest in Hidden Empire activity. Considering the absence of other noteworthy content pertaining to Deon Taylor or Hidden Empire – aside from the court filings, malicious content and videos – the Hollywood Street King and Jacky Jasper properties are seemingly operating strictly in the interests of Angelone. Further, the video footage used by Hollywood Street Kings/Jacky Jasper was obtained using improper access to Hidden Empire servers. Ultimately, this continued activity has demonstrated an organized and intentional effort to use online and digital tactics to raise public – and negative – attention towards Deon Taylor and Hidden Empire.

4. Public Records Show That Angelone Used The Name “Jacky Jasper” As A Pseudonym

Angelone was a party to a lawsuit titled *Tosh A. Berman v. Greg Comeau, a/k/a, Jacky Jasper doing business as Diary of a Hollywood Street King, Darrick Angelone*, Los Angeles Superior Court, Case No. BC509496, filed May 23, 2013 (“Berman Lawsuit”). Documents reviewed from that lawsuit include the Complaint; Declaration of Christian S. Molnar, Esq. In Support of Request for a Default Judgment Against Defendant Darrick Angelone and Request for an Award of Costs (“Molnar Declaration”); and (c) Judgment By Default by Court (“Berman Judgment”).

Attached to the Molnar Declaration as Exhibit F are portions of sworn deposition testimony of Angelone from a separate lawsuit titled *Angelone v. Midway Rent a Car, etc., et al.*, Los Angeles Superior Court No. BC485275. In that deposition, Angelone acknowledged his relationship with the name “Jacky Jasper” and his affiliation with the Hollywood Street King website, and admitted that there is no person with the name “Jacky Jasper” because that name is just a moniker used by the Hollywood Street King website and is not the name of a real person. In addition, in the Berman Judgment entered against Angelone, the Court indicated in its judgment against all Defendants that Angelone and Jacky Jasper are the same person, stating: “In this action, Defendant DARRICK ANGELONE, an individual, a/k/a GREG COMEAU, a/k/a, JACKY JASPER doing business as DIARY OF A HOLLYWOOD STREET KING (‘Defendant ANGELONE’). . .”

Angelone was also a party to a lawsuit titled *Her Enterprises et. Al. v. Jacky Jasper et. al.*, Los Angeles Superior Court, Case No. SC112442, filed April 29, 2011, wherein Darrick Angelone, Jacky Jasper, Hollywood Street King and other parties were named as defendants in a defamation lawsuit based on articles posted on the Hollywood Street King website.

Topic 2: Interference with Hidden Empire Social Media Properties

1. AONE logo posts from Hidden Empire Properties

On or around September 6, 2022, the Hidden Empire social channels began exhibiting irregular activity. Specifically, the Hidden Empire Instagram account posted an image of the “AONE” logo to their feed; they also posted the same image to their Instagram Story, and “pinned” the story to the top of their profile, maximizing visibility alongside upcoming films that Hidden Empire was promoting. The post itself generated 54 total engagements, and included the caption “brought to you by!!! 😊”; the caption can be interpreted to imply an AONE or an AONE affiliated party was claiming responsibility for the post.

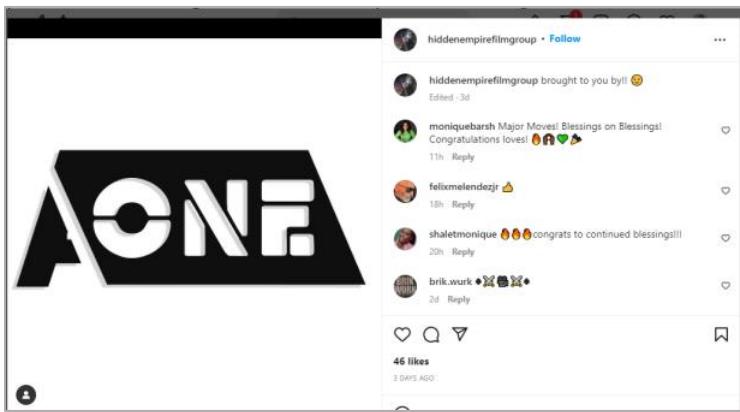


Figure 3: Hidden Empire Instagram Post of AONE logo



Figure 4: Hidden Empire Instagram Account - Pinned Story post of AONE logo

The same post was shared by the Hidden Empire Twitter Account. Most notably, Angelone “liked” this post from his personal Twitter account, thus publicly acknowledging the post.



Figure 5: Hidden Empire Twitter (X) post with link to AONE logo and Instagram post



Figure 6: Darrick Angelone Twitter (X) profile and “likes” page, showing him “liking” the Hidden Empire post of the AONE logo

2. Hidden Empire Twitter Account replicate hacked/bot activity.

During the same time period beginning on or around September 6, 2022, the Hidden Empire Twitter account began “liking” a random assortment of miscellaneous content. The “liked” content included a wide range of topics from job opportunities, iPhone reviews, and cryptocurrency information. This activity is all public; the lack of a pattern or reoccurring theme of this “liked” content – none of which was related to Hidden Empire’s business – comes across as unprofessional and highly suspicious. This tactic seemingly replicates a “bot” or “spam account”. This action may suggest the creation of a “digital alibi”, by acting as if the account has been hacked by an automated threat actor.



Figure 7: Hidden Empire Twitter (X) account showing abnormal "like" activity

3. Hidden Empire Account Relabeled and later deactivated

On or around September 30, 2022, Hidden Empire Twitter channel (@hiddenempirefg) was deactivated and/or appeared as nonexistent. Account deactivation is most frequently an intentional act by the account holder, but in the case of Hidden Empire where the account is used for business purposes, complete deactivation is highly unusual. Outside of user deactivation, Twitter policy may deactivate account when spam activity is detected (although this was highly uncommon under previous Twitter regulation) and more often occurred as a result of another user reporting spam activity.

When searching manually for the Hidden Empire twitter account following the deactivation, the first result suggested by Twitter was an account titled "Aone Creative" with the handle @DerrickDidIt. This seemingly "new" account also used the same AONE image as a profile picture that was previously shared on the Hidden Empire channels in the aforementioned posts. Further, the account was set to private, making it impossible to review historical activity.

Most notably, the account had 10.9k followers, which is extremely difficult for a private and/or new account to achieve in a short period of time. Likewise, private accounts must "accept" new followers, so to assume this account was private since its inception means that the account owner would have manually approved 10,900 individual follower requests. The most common way for a private account such as this to amass such a high following would be to have grown an audience as a public account, and then switch the setting to "private".

Of further significance is the search results itself on Twitter, where this seemingly new account (@DarrickDidIT) is the first result when searching for Hidden Empire. While Twitter's search ranking algorithm is not public, some factors that contribute to search results include account popularity and Twitter's "connection graph". The "connection graph" is a propriety code that creates a unique social graph based on user behavior, history, and existing connections. Accordingly, the search results that show @DarrickDidIt when looking for Hidden Empire do indicate some sort of digital connectivity between the two accounts.

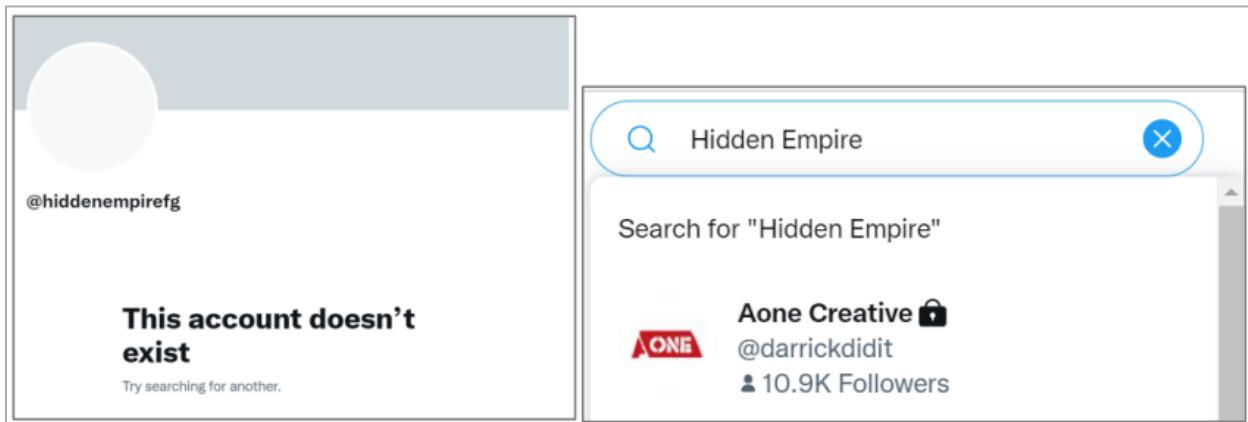


Figure 8: Deactivated Hidden Empire Twitter (X) profile; Search results showing "Aone Creative" (@DarrickDidIt)

Moreso, the profile image and account name all reflect social collateral previously, and recently, published on Hidden Empire accounts in a suspicious nature. While FTI is unable to determine the exact timestamp that the deactivation took place, the overall proximity to the September 30th Preliminary Injunction would indicate a bad faith effort on behalf of Mr. Angelone resolve this matter, and an attempt to further inconvenience Hidden Empire.

Further discovery with Twitter determined that the account was permanently deleted from the platform on November 4, 2022, thus making any future attempts to regain account access impossible. This also prevented the discovery of any learnings regarding what happened to the account between the week of September 30th and November 4th, during which the aforementioned suspicious activity was present.

Ultimately, the combination of the below factors depict a highly suspicious sequence of events:

- 1) Posting of AONE imagery to Hidden Empire Channel
- 2) Randomized "liking" of irrelevant content and "bot-like" activity;
- 3) the deactivation of @hiddenempirefg;
- 4) the appearance of a seemingly new account @DarrickDidIt that included previously used AONE imagery;
- 5) the identical follower count as the deactivated @hiddenempirefg account and;
- 6) The Twitter search results that display this new account when looking for the Hidden Empire account

Conclusion

FTI has identified multiple instances of suspicious digital activity by Angelone's "Jacky Jasper" pseudonym that seemingly intend to cause a negative impact on Deon Taylor and Hidden Empire Film group. Actions taken by Jacky Jasper and/or Hollywood Street King Properties, in addition to posts from Hidden Empire social channels, including the deactivation of the @hiddenEmpireFG twitter account, underscore a likelihood of intentional meddling and/or interference with Hidden Empire properties and reputational awareness, which likely damaged Plaintiffs' reputations.

I reserve the right to amend this report as discovery progresses in this case, after my review of deposition testimony, and to respond to and rebut any opinions offered by experts retained by the Defendants.

/s/ Alex Izen

Alex Izen, Senior Director, Digital & Insights – Strategic Communications

Email: alex.izen@fticonsulting.com

ABOUT FTI CONSULTING

FTI Consulting is an independent global business advisory firm dedicated to helping organizations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational, and transactional.

Individually, each practice is a leader in its specific field, staffed with experts recognized for the depth of their knowledge and a track record of making an impact. Collectively, FTI Consulting offers a comprehensive suite of services designed to assist clients across the business cycle — from proactive risk management to the ability to respond rapidly to unexpected events and dynamic environments. We lead engagements in the following industries:

- Aerospace & Defense
- Agriculture
- Airlines & Aviation
- Automotive & Industrial
- Construction
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- Environmental
- Financial Services
- Healthcare & Life Sciences
- Hospitality, Gaming & Leisure
- Insurance
- Mining
- Public Sector & Government Contracts
- Real Estate
- Retail & Consumer Products
- Telecom, Media & Technology
- Transportation & Logistics

With more than 7,600 employees located in 31 countries, FTI Consulting professionals work closely with clients to anticipate, illuminate, and overcome complex business challenges and make the most of opportunities.

Specific to this report, FTI's Strategic Communication and Digital and Insights practice was responsible for leveraging a suite of digital tools and resources to regularly monitor the key online properties relevant to Hidden Empire Film Group.

Key Personnel

The following members of FTI consulting contributed to this report:

Alex Izen: Senior Director, Digital & Insights – Strategic Communications



Alex Izen is recognized for his ability to leverage data and actionable insights to drive focused strategy, enabling brands and individuals to achieve overarching business goals by utilizing an efficient approach to communication. His experience working across the rapidly evolving digital landscape provides a valuable understanding of key digital touch points and the role they play in informing perception and influencing action.

Phone

917-434-3802

Location

New York, NY

Education

University of Michigan, B.A.

Mr. Izen has led digital intelligence and research efforts across various aspects of litigation in support of Counsel, in addition to major brands such as Diageo, P&G, Capital One, and Samsung. Mr. Izen's work has leveraged digital technology and monitoring capabilities to assess online conversation and key social inflection points across the digital ecosystem. Further, Alex helped brands navigate the tumultuous pandemic with real time monitoring across a diverse set of industries, with additional media experience stretching from high profile litigation matters multiple Super Bowl campaigns. Prior to joining FTI, Alex was on the Business and Competitive Intelligence team at Taylor Strategy and Havas Media, respectively, working to inform and execute media campaigns for both consumer brands and clients in more heavily regulated industries. Alex graduated from the University of Michigan with a BA in Communications

APPENDIX

Exhibit A:

photographs, leaking gossip, and even sending iMessages from her account to her husband and daughter.

We say "as far as we can tell" because the hacker has stayed hidden and the Kardashian camp won't talk to us except to categorically deny Jenner's involvement.

The exact connection between the previously reported hacking attacks and Bankston, who TMZ implies is mentally disturbed, is still unclear. TMZ and Radar have variously reported that Jenner's Instagram account was hacked, that "pranksters" were making restaurant reservations under her name, and that she'd received threatening phone calls.

But the existence of this recording, and the way in which it came to us, indicate that Bankston and at least one hacker may have worked together, attempting to catfish not just Jacky Jasper's blog but also TMZ and other gossip outlets.

Eventually, it seems, the impersonator unleashed a stream of racist invective while pretending to be Kris Jenner—invective memorialized on the aforementioned recording and put on the market as the "story of the year."

We were first introduced to the tape in early July, when we got a call from a man who introduced himself as Jacky Jasper, the proprietor of a gossip blog called [Diary of a Hollywood Street King](#). Jasper told us he had an hour-long tape of a phone conversation between himself and Kris Jenner in which Jenner allegedly embarked on a Donald Sterling-esque racist rant. He wanted to sell it to us, or partner with us in some way to publish it.

We were, needless to say, interested. Earlier in the year, Jenner and her daughter Kim Kardashian had been approached and harassed by [a white Austrian comedian in blackface](#) at the Vienna Opera Ball. Jenner's offended reaction was widely covered—and featured in her reality show—but it'd be placed in much different light if there existed a recording of her using racial slurs herself. Especially if such a recording could be published.

So Jasper put us in touch with a lawyer, a guy named Darrick Angelone, and after we agreed not to publish any portion of the tape until terms had been set, we received two clips from the phone conversation.

In the first clip, the woman alleged to be Jenner uses the word "nigger" a series of times—including directly at Jasper, on the other end of the line—and says that she loves her son-in-law West only because "he has money." In the shorter clip, the woman refers to Jaden Smith as a "butler."

Jasper and Angelone told us that they had interest in the tapes from other outlets—they named AMI, the parent company of *National Enquirer* and Radar Online; TMZ; and several British tabloids—at prices well out of our range, but wanted to sell to us because they were convinced that those outlets would suppress the tape in exchange for access. (They also expressed their admiration for Gawker Media founder Nick Denton.)

Nevertheless, there was some pressure to make an offer. We told them we needed time to verify the recording, and we asked that they let us know if they planned to sell it to another publisher.

Because here's the thing: The woman sounded a *lot* like Kris Jenner. We isolated individual words and phrases from the recordings and compared them to the same words and phrases spoken during Jenner's television appearances. We did some very preliminary analysis of the recording's waveforms to confirm that it hadn't been doctored. We played it for *Keeping Up With the Kardashians* superfans. The recording *seemed* to everyone—at least in this early, passing stage—to be legitimate.

But we were still skeptical. For one thing: How did a small-time gossip blogger strike up a friendship with one of television's biggest stars? Diary of a Hollywood Street King mostly runs rumors about black reality-television celebrities that even MediaTakeOut might think are too flimsy (or worthless) to publish.

Jasper's story was that he'd struck up a relationship with Kris Jenner through an intermediary named Troy Leatherby. Leatherby, Jasper said, identified himself as Jenner's assistant and claimed that he and Jenner were having an affair.

Jasper and his lawyer told us that Leatherby had been the source of two items published on Hollywood Street King in March: a since-deleted one claiming that Jenner staged the infamous fight between West and a racially abusive white teenager, and another that alleges to show Jenner arranging a hookup with a 38-year-old man named "Troy Leapherby." (The misspelled last name is likely a typo, but it did not exactly inspire confidence in the consistency of Jasper's account.)

Two days after publishing those items, Jasper posted emails from someone calling herself "Kris" that implore Jasper to pull the posts down.

Exhibit B:

That same year, a blogger revealed Mr. Sheen's status in several online posts. The first account appeared in April 2014, about three years after Mr. Sheen said he received the diagnosis and 19 months before he sat down with Mr. Lauer. The posting appeared on the blog Diary of a Hollywood Street King, which was co-founded and is largely written by a former rapper, Jacky Jasper. It reported not only that Mr. Sheen had H.I.V. but that he was paying a 25-year-old woman to keep his secret.



Jacky Jasper, who revealed Mr. Sheen's condition in several blog posts, the first account appearing in April 2014, on the site Diary of a Hollywood Street King. Edward Linsmier for The New York Times

Over the next few months, Mr. Jasper went on to post about a half-dozen items citing Mr. Sheen's condition on his blog, which carries the motto "Brewing and serving piping hot celebrity tea and scandal since 2008!" He was emboldened, Mr. Jasper said in an interview, by seeing photographs of Mr. Sheen's antiretroviral medicines. The photos, Mr. Jasper said, had been taken by a woman after she'd had sex with Mr. Sheen and had been provided to the blogger by an acquaintance of hers.

(During his “Today” appearance, Mr. Sheen confirmed that one of the people he was paying was someone who had taken pictures of his medicines with a cellphone.)

But at the end of the summer of 2014, the blog posts disappeared.

A lawyer for the blog, Ronald Richards, was approached that July by another lawyer, Keith Davidson, emails between the two men show. Mr. Davidson had previously represented a woman who accused Mr. Sheen of abuse. Now he was seeking “a complete blackout on objectionable subject matter,” according to the emails obtained by The National Enquirer and provided to The New York Times.

Mr. Richards said he did not ask Mr. Davidson whom he was representing. “It was irrelevant to me,” he said, adding that the posts were taken down for “business reasons.”

Mr. Davidson later thanked Mr. Richards in an email for “the prompt work of deleting and/or redacting the offending content,” and spoke of four payments of \$15,000 being made as a result.

Mr. Jasper said he had not been aware that items from the blog were taken down or that money had changed hands. He said that while he wrote many of the posts, the technical and business operations of the site were handled by a colleague, Darrick Angelone of AOne Entertainment. Mr. Richards said he forwarded the payments to that company.

Mr. Davidson and Mr. Angelone did not respond to messages requesting comment. Mark Burg, Mr. Sheen’s manager, said the actor had nothing to do with the payments.

Regardless of who was responsible, the posts’ disappearance returned Mr. Sheen’s secret to the darkness, at least for a while.

As it turned out, though, The National Enquirer was also pursuing the story. Dylan Howard, the top editor at that tabloid, said the paper began looking into rumors that Mr. Sheen was ill in the fall of 2013 and its curiosity was piqued when Mr. Jasper’s blog posts came down.

Soon after Mr. Sheen’s announcement, the posts about his H.I.V. went back up on the Hollywood Street King blog. Then, surprisingly, after months of tension, Mr. Sheen agreed to an interview last month with The Enquirer.

“It was such a tremendous weight lifted off my shoulders when I made the announcement,” he told Mr. Howard. “I realized afterwards, I wish I had possibly done it sooner.”

Exhibit C:

DEON AND ROXANNE TAYLOR ORDERED TO ANSWER THE NUMEROUS CLAIMS FILED AGAINST THEM BY FORMER PARTNER

By **Jacky Jasper** - Aug 11, 2023

Legal Showdown Alert: Deon Taylor and Hidden Empire Film Group Ordered to Put Up or Shut Up!

Full docket text for document 99:

MINUTES (IN CHAMBERS) ORDER DENYING MOTIONS TO DISMISS CLAIM FOR PROMISSORY FRAUD [93][94] by Judge Michael W. Fitzgerald. The Motion is DENIED. The Taylors shall answer the 4ACC and Amended TPC by no later than August 9, 2023. (iv)

10/23, 3:11 PM

Deon and Roxanne Taylor Ordered to Answer the Numerous Claims Filed Against Them by Former Partner

Case 2:22-cv-06515-MWF-AGR Document 91 Filed 06/12/23 Page 1 of 65 Page ID #:3854

1 J.T. Fox, Esq., SBN 195063
2 LAW OFFICES OF JT FOX & ASSOCIATES, APC
3 556 S. Fair Oaks Ave., No. 444
4 Pasadena, CA 91105
5 (888) 750-5530 Work
6 (888) 750-5530 Fax
7 E-Mail: jt@jtfoxlaw.com
8 Attorney for Defendants,
9 DARRICK ANGELONE, AONE CREATIVE, LLC, and ON CHAIN INNOVATIONS,
10 LLC
11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13
14 DARRICK ANGELONE, an individual;
15 AONE CREATIVE, LLC, formerly
16 known as AONE ENTERTAINMENT
17 LLC, a Florida limited liability company;
18 and ON CHAIN INNOVATIONS, LLC,
19 a Florida limited liability company,
20 Counterclaimants.
21 v.
22 HIDDEN EMPIRE HOLDINGS, LLC; a
23 Delaware limited liability company;
24 HYPER ENGINE, LLC; a California
25 limited liability company; and DEON
26 TAYLOR, an individual,
27 Counterclaim Defendants.
28
29 DARRICK ANGELONE, an individual;
30 AONE CREATIVE, LLC, formerly
31 known as AONE ENTERTAINMENT
32 LLC, a Florida limited liability company;
33 and ON CHAIN INNOVATIONS, LLC,
34 a Florida limited liability company,
35 Third-Party Plaintiffs,
36 v.
37 ROXANNE TAYLOR, an individual,
38 Third-Party Defendant.

CASE NO. 2:22-cv-06515-MFW-AGR

DEFENDANTS' FOURTH AMENDED COUNTERCLAIMS FOR DAMAGES BASED ON:

(1) BREACH OF EXPRESS ORAL CONTRACT
(2) BREACH OF IMPLIED CONTRACT
(3) BREACH OF FIDUCIARY DUTY
(4) PROMISSORY FRAUD
(5) UNJUST ENRICHMENT
(6) DECLARATORY RELIEF
(7) QUANTUM MERUIT

Complaint Filed: Sept. 12, 2022

Assigned for all purposes to the Honorable Judge Michael W. Fitzgerald

We've got a scandal that's juicier than a ripe watermelon on a sizzling summer day. Brace yourselves as we dive headfirst into the shady world of Hidden Empire Holdings and the legal storm that's swirling around them like a Santa Ana gust. If you thought the drama around Deon Taylor, Roxanne Taylor and Hidden Empire Film Group was cooling down, think again! We've got lawsuits, denials, and a dash of courtroom defeats to serve up piping-hot.

Grab your shades because the shade is about to get real. We're talking about none other than Deon Taylor, Roxanne Taylor, Hidden Empire Film Group, and the elusive Hyper Engine. These Hollywood transplants are finding themselves in quite the legal pickle, and it's giving us more drama than a reality TV marathon.

In the realm of legal affairs and the entertainment industry, a notable lawsuit has emerged, drawing attention to prominent figures within the film production sector. The lawsuit, filed by Darrick Angelone and Aone Creative LLC, targets Deon Taylor, Roxanne Taylor, Hidden Empire Film Group, and Hyper Engine. This legal dispute, bearing significant implications, has been unfolding with multiple developments that warrant consideration.

Despite the defendants' efforts to have the case dismissed, it has come to light that their motion for dismissal has been denied not once, but twice. The court, presided over by Judge Michael W. Fitzgerald, has mandated that the defendants address the claims presented by Darrick Angelone and Aone Creative LLC. The deadline for their response has been set for August 9, 2023.

The case in question bears the reference number 2:22-cv-06515-MFW-AGR and centers around the fourth amended counterclaims for damages, encompassing a range of legal causes:

1. **Breach of Express Oral Contract**
2. **Breach of Implied Contract**
3. **Breach of Fiduciary Duty**
4. **Promissory Fraud**
5. **Unjust Enrichment**
6. **Declaratory Relief**
7. **Quantum Meruit**

The lawsuit pertains to contractual matters, alleged misconduct, and fiduciary obligations involving Deon and Roxanne Taylor as well as their company Hidden Empire Film Group and the marketing company Hyper Engine. With the denial of the motion to dismiss, the legal landscape has evolved, potentially leading to a more comprehensive examination of the claims and their associated implications.

As the legal process unfolds, it becomes evident that the outcome of this lawsuit holds significant ramifications for the parties involved. The allegations, which span various aspects of contractual relationships and financial dealings, underscore the complexity of the case.

The entertainment industry is no stranger to legal disputes, but the involvement of mildly notable players such as Deon Taylor and Hidden Empire Film Group adds an additional layer of attention to this particular case.



About the author: Jacky Jasper is the Hollywood gossip columnist renowned for fearlessly uncovering the scandals and secrets of the entertainment industry.

Exhibit D:

DIRECTOR DEON TAYLOR CHIMES IN ON JADA SMITH'S TOXICITY & WILL SMITH AND CHRIS ROCK'S MASCULINITY!

By [Jacky Jasper](#) - Mar 1, 2023



Self-proclaimed as "the hottest Director in Hollywood," Deon Taylor reveals his true thoughts on [@willsmith](#) and [@chrisrock](#)'s lack of manhood, [@jadapinkettsmith](#)'s toxicity and jokes about George Floyd and [@lavernecox](#)

There is a lot to unpack in this video here... [@deontaylor](#) sure has a way with words!
Thoughts?

Exhibit E:



Jacky Jasper 
@hwdstreetking

...

Now you've been on Jamie's jock so long Deon.... It's foul to be hearing you talk like this!!!



12:23 PM · Feb 17, 2023 · 1,690 Views

Exhibit F:

HIDDEN EMPIRE'S TROUBLING CONNECTIONS AND LITIGATION NIGHTMARE

By **Jacky Jasper** - May 31, 2023

Betrayal, Fraud, and Unjust Enrichment Cast Shadows Over Hidden Empire Holdings



Brace yourselves, dear readers, as the drama surrounding Hidden Empire Holdings takes a sinister turn. As if the ongoing legal battle wasn't scandalous enough, we now uncover their questionable connections and dubious development deals that should make anyone think twice before teaming up with this troubled studio.

First on the list is their development deal for the movie "Free Agents" with Tristar. While this collaboration might seem promising on the surface, recent revelations have shed light on Hidden Empire's alleged misconduct. Claims filed against Hidden Empire, Deon Taylor and Roxanne Taylor expose a web of deceit, breach of fiduciary duty, promissory fraud, and unjust enrichment. It raises

concerns about the integrity of Hidden Empire's involvement in any future projects, including "Free Agents."

Adding to the intrigue is their association with the infamous Jason Lee and his West Hollywood gag crew. Lee, known for his controversial antics, has been linked to Hidden Empire in various capacities. The connection between these two entities raises eyebrows and questions about the ethical standards maintained within Hidden Empire.

But the controversies don't stop there. Hidden Empire's recent ventures into biopics have raised red flags among industry insiders. Their involvement in the production of the lifetime story of fighter Floyd Mayweather and the BET series with Master P has come under scrutiny. Given the ongoing legal troubles surrounding Hidden Empire, industry professionals and fans alike may question the wisdom of entering into any collaboration with the embattled studio.

As the legal battle unfolds, it becomes increasingly clear that Hidden Empire's reputation hangs in the balance. The allegations of betrayal, fraudulent conduct, and financial impropriety cast a dark shadow over the studio's future endeavors. Industry figures must consider the potential risks and consequences of aligning themselves with Hidden Empire and its scandal plagued leadership.

In this ever-evolving saga, one thing is certain: the Hollywood gossip mill will be buzzing with updates and revelations as the truth about Hidden Empire Holdings continues to unravel. Stay tuned for more explosive details and exclusive insider insights into this Hollywood scandal.

About the author: Jacky Jasper is the Hollywood gossip columnist renowned for fearlessly uncovering the scandals and secrets of the entertainment industry.

Exhibit G:

 **Jacky Jasper** 
@hwdstreetking ...

@iamjamiefoxx's fake friend is none other than this snake, Deon Taylor!
God looking to strike you soon! #fanboy #younotspikelee



Exhibit H:

DEON AND ROXANNE TAYLOR ORDERED TO ANSWER THE NUMEROUS CLAIMS FILED AGAINST THEM BY FORMER PARTNER

By [Jacky Jasper](#) - Aug 11, 2023



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1 J.T. Fox, Esq., SBN 195063
2 LAW OFFICES OF JT FOX & ASSOCIATES, APC
3 556 S. Fair Oaks Ave., No. 444
4 Pasadena, CA 91105
5 (888) 750-5530 Work
6 (888) 750-5530 Fax
7 E-Mail: jt@jtfoxbiz.com
8 Attorney for Defendants,
9 DARRICK ANGELONE, AONE CREATIVE, LLC, and ON CHAIN INNOVATIONS,
LLC
10 UNITED STATES DISTRICT COURT
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20 HIDDEN EMPIRE HOLDINGS, LLC; a
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22 HYPER ENGINE, LLC; a California
23 limited liability company; and DEON
24 TAYLOR, an individual,
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LLC, a Florida limited liability company;
and ON CHAIN INNOVATIONS, LLC,
a Florida limited liability company,
Third-Party Plaintiffs,
v.
ROXANNE TAYLOR, an individual,
Third-Party Defendant.

CASE NO. 2:22-cv-06515-MFW-AGR

DEFENDANTS' FOURTH AMENDED COUNTERCLAIMS FOR DAMAGES BASED ON:

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We've got a scandal that's juicier than a ripe watermelon on a sizzling summer day. Brace yourselves as we dive headfirst into the shady world of Hidden Empire Holdings and the legal storm that's swirling around them like a Santa Ana gust. If you thought the drama around Deon Taylor, Roxanne Taylor and Hidden Empire Film Group was cooling down, think again! We've got lawsuits, denials, and a dash of courtroom defeats to serve up piping-hot.

Grab your shades because the shade is about to get real. We're talking about none other than Deon Taylor, Roxanne Taylor, Hidden Empire Film Group, and the elusive Hyper Engine. These Hollywood transplants are finding themselves in quite the legal pickle, and it's giving us more drama than a reality TV marathon.

In the realm of legal affairs and the entertainment industry, a notable lawsuit has emerged, drawing attention to prominent figures within the film production sector. The lawsuit, filed by Darrick Angelone and Aone Creative LLC, targets Deon Taylor, Roxanne Taylor, Hidden Empire Film Group, and Hyper Engine. This legal dispute, bearing significant implications, has been unfolding with multiple developments that warrant consideration.

Despite the defendants' efforts to have the case dismissed, it has come to light that their motion for dismissal has been denied not once, but twice. The court, presided over by Judge Michael W. Fitzgerald, has mandated that the defendants address the claims presented by Darrick Angelone and Aone Creative LLC. The deadline for their response has been set for August 9, 2023.

The case in question bears the reference number 2:22-cv-06515-MFW-AGR and centers around the fourth amended counterclaims for damages, encompassing a range of legal causes:

1. **Breach of Express Oral Contract**
2. **Breach of Implied Contract**
3. **Breach of Fiduciary Duty**
4. **Promissory Fraud**
5. **Unjust Enrichment**
6. **Declaratory Relief**
7. **Quantum Meruit**

The lawsuit pertains to contractual matters, alleged misconduct, and fiduciary obligations involving Deon and Roxanne Taylor as well as their company Hidden Empire Film Group and the marketing company Hyper Engine. With the denial of the motion to dismiss, the legal landscape has evolved, potentially leading to a more comprehensive examination of the claims and their associated implications.

As the legal process unfolds, it becomes evident that the outcome of this lawsuit holds significant ramifications for the parties involved. The allegations, which span various aspects of contractual relationships and financial dealings, underscore the complexity of the case.

The entertainment industry is no stranger to legal disputes, but the involvement of mildly notable players such as Deon Taylor and Hidden Empire Film Group adds an additional layer of attention to this particular case.

Exhibit I:

DEON TAYLOR EXPOSED: THE 'FAKE FRIEND' IN JAMIE FOXX'S SCANDALOUS POST

By **Jacky Jasper** - Aug 22, 2023



Jacky Jasper 

@hwdstreetking · [Follow](#)



@iamjamiefoxx's fake friend is none other than this snake, Deon Taylor! God looking to strike you soon! [#fanboy](#) [#younotspikelee](#)



1:07 PM · Aug 7, 2023



2



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In Hollywood, name-dropping can sometimes be considered an art. Some do it subtly, hoping to elevate their own status, while others do it as a strategy to stay relevant. But then there's Deon Taylor, who has, time and again, taken name-dropping to a whole new level. His most recent dig? At none other than Hollywood heavyweight Jamie Foxx.

But let's backtrack a bit. Deon Taylor, self-proclaimed "the hottest Director in Hollywood," has a reputation for not just dropping names, but also often delivering derogatory remarks about the same. Remember the time he brazenly [expressed his unsavory thoughts on Will Smith and Chris Rock's perceived lack of manhood? Or when he hinted at Jada Pinkett Smith's supposed toxicity?](#) Not to mention his off-color jokes about George Floyd and Laverne Cox. His comments always seem to stir the pot, often leading to heated debates and discussions.

This time, Taylor is in the headlines again. Sources close to the situation say that Jamie Foxx's controversial, now-deleted Instagram post, which was perceived as antisemitic, was indirectly aimed at Taylor. After a Zoom call surfaced showcasing Deon belittling Jamie's business acumen, Foxx, evidently irate, took to Instagram to vent his feelings. While his intention was to address personal betrayal, it unfortunately came across as a generalization, landing him in hot water.

However, Jamie Foxx's involvement in this entire saga, though significant, isn't the main story here. The real focus should be on Deon Taylor's unrelenting penchant for controversy. His dismissive remarks about Hollywood peers and his somewhat audacious approach towards sensitive topics have left many wondering about his true intentions. Is it a publicity strategy, or is he genuinely oblivious to the impact of his words?

Yet, amidst all this chaos, one must not forget Jamie Foxx's recent struggles with his health. The actor has been recovering from a severe medical complication. His emotional journey through this ordeal could have played a part in his choice to make the controversial post.

As Deon Taylor continues to make headlines, not only for his caustic remarks but also for legal entanglements, the dynamics within Hollywood appear to be shifting. [Recent reports highlight the ongoing litigation between Taylor's Hidden Empire Film Group former partner in Hyper Engine LLC., AONE Creative LLC.](#) This legal battle further muddies Taylor's already turbulent reputation. With each controversy, whether it's his words or business dealings, the question arises: how much more can Taylor's damage his own image? For Jamie Foxx and others indirectly ensnared in Taylor's web of disputes, the hope is likely for a future free of such chaotic associations. One thing's clear: in the unpredictable landscape of Hollywood, Deon Taylor's fall from grace remains one to watch.



Exhibit J

DEON TAYLOR'S KING BACH ZOOM PITCH DISASTER, IGNORANCE ON FULL DISPLAY!

By [Jacky Jasper](#) - Sep 18, 2023



Alright, HSK fam, Jacky Jasper's got the inside scoop on one of the most embarrassing industry leaks in recent memory. Grab your popcorn because this tea is scalding!

So, the scene is set with director Deon Taylor, who, if y'all remember, gave us that epic fail, "Fear," earlier this year, which also starred Andrew Bachelor (aka King Bach) along side Joseph Sikora, Terrence J and the rapper TI. I mean, who knew a movie could crash and burn that spectacularly? Anyway, the man thought he could redeem himself by diving into the world of TV pitches, and boy, was he mistaken.

In a leaked Zoom conference video, Taylor tries to make his big pitch for a TV series revolving around social media sensation, King Bach. But here's where things go hilariously south: the man seemed to have done zero homework. First off, he claims that King Bach met Steve Jobs. News flash, Deon: Steve Jobs left us in 2011, a whole three years before Vine even came into existence! And we're supposed to believe that King Bach was chilling with Jobs? C'mon now!

And speaking of King Bach, let's get one thing straight: while the man surely made waves on Vine, claiming he was the first social media celebrity is a stretch. Ever heard of Tila Tequila, Deon? But wait, the cringe doesn't end there. Taylor's tech knowledge is laughably basic. For someone attempting to pitch a show about a social media star, you'd think he'd know the basics, right?

2003



Nguyen joined Myspace in the **fall of 2003** after getting booted off of Friendster multiple times. Time magazine, in a 2006 profile of Nguyen noted her impact on the platform stating "Pre-Tila, your MySpace friends were mostly people you actually knew."

W https://en.m.wikipedia.org/wiki/Tila_Tequila

The cherry on top of this mess? Deon openly mentions he wants to "rip off" the concept of "Entourage." Originality clearly isn't his strong suit.

For those keeping score at home: Deon Taylor is zero for...well, all of his movies in terms of profits. And now, with this half-baked pitch, it's clear that research, understanding, and maybe a little honesty aren't in his playbook.

In an industry where your reputation can make or break you, Taylor's latest fiasco is sure to leave a mark. Here's some free advice, Deon: maybe next time do a little research and perhaps, just perhaps, come up with an original idea.

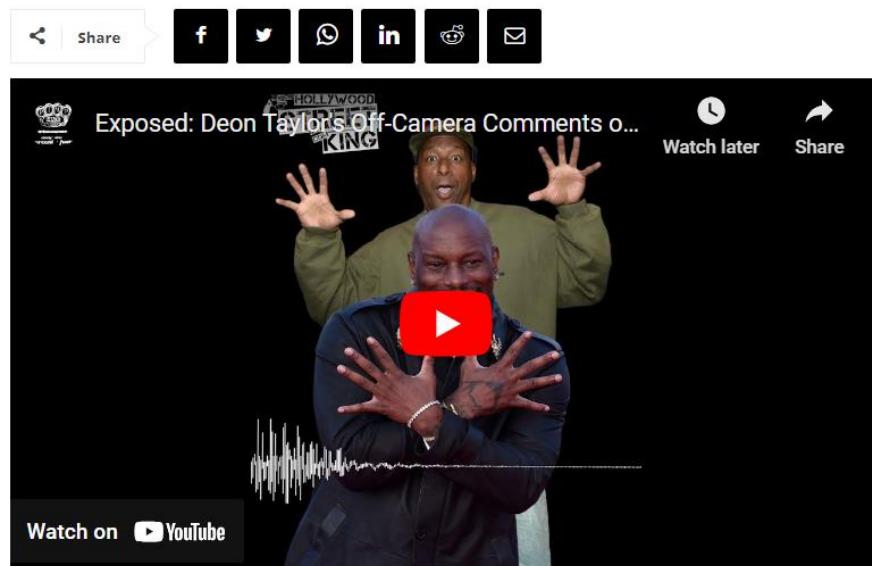
As always, keep it locked here on HSK for all the juiciest stories and inside scoops. Until next time! 🎉🍿



Exhibit K:

DEON TAYLOR'S UNFILTERED TAKE ON TYRESE'S SOCIAL MEDIA SKILLS | HSK EXCLUSIVE

By [Jacky Jasper](#) - Sep 26, 2023



"Meet the Blacks" director, Deon Taylor, seems to be navigating a stormy Hollywood year, as a series of leaked videos and calls have exposed his unfiltered opinions about some of the industry's most prominent figures.

The first blow to Taylor's reputation came when a leaked video revealed his candid views on Hollywood power couple, Will & Jada Smith. [Taylor not only branded Jada as "toxic" but also suggested that both Will Smith and Chris Rock lacked manhood.](#)

Yet, the controversies didn't end there. Another leak soon followed, putting Taylor under scrutiny once more. This time, the video portrayed him disparagingly discussing Jamie Foxx's business acumen or [Taylor's claim to Foxx's lacking such](#). This revelation was particularly surprising for many, given the belief that Taylor and Foxx were close friends. The video, however, painted a different picture, revealing that Taylor is the 'fake friend' Foxx referred to in his since retracted post about fake friends.

Taylor's penchant for dropping names and voicing controversial opinions continued as he then set his sights on another 'friend' of his, singer and actor, Tyrese. In a conversation with notable figures from Bach Enterprises, including King Bach, Caleeb Pinkett, and Gary Glushon, Taylor seemed to favorably compare Kevin Hart's strategic use of social media to Tyrese's approach.

Taylor said, "*I just think this is right up his alley... out of everybody I could think of, it's interesting that it could be him. Kevin has really weaponized himself with social media... He's really figured out a way to actually use that world, unlike Tyrese.*"

Those close to Deon Taylor say he frequently expresses his discontent about the lukewarm reception of "Black and Blue." He often attributes the film's shortcomings to Tyrese's volatile social media antics and sensitive nature. Don't believe us? Just ask Omar Joseph. However, Taylor is overlooking a broader pattern in his career. Despite having directed or produced a whopping 19 films, not one has achieved success or profits. I suggest it's Taylor's own inability to create resonant and original film narratives. The consistent box office misses might be a reflection of deeper challenges in Taylor's directorial approach rather than the shortcomings of any one actor.



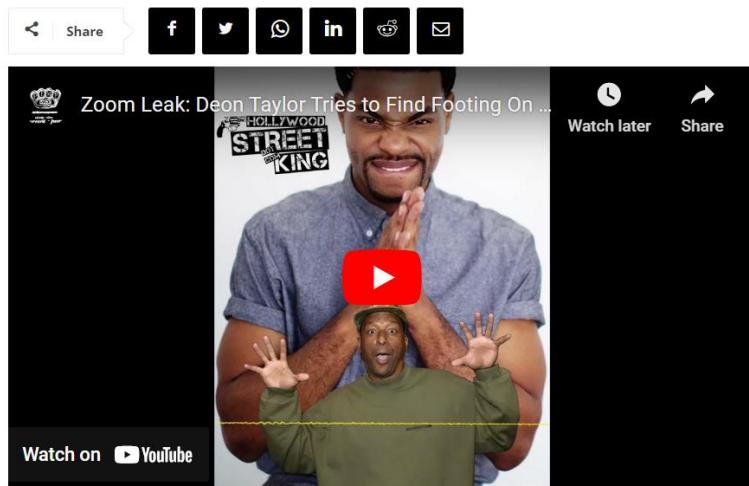
Man, ya'll heard those leaked calls from Deon Taylor? Dude's out here sounding more like a starstruck groupie than a legit Hollywood filmmaker. Trippin' over anyone who's got some followers. But Kevin Hart working with Deon or Hidden Empire Film Group? Pssh! That's a fairy tale. Don't believe me? Just ask Jeff Clanagan.

Comparing Kevin Hart's use of social media to Tyrese's couldn't be less relevant to the conversation. Deon's lack of knowledge leads him astray once again. #FAIL

Exhibit L:

LEAKED AUDIO EXPOSÉ: DEON TAYLOR AND KING BACH'S DUBIOUS PASTS UNVEILED

By [Jacky Jasper](#) - Sep 28, 2023



Alright, HSK fam, remember when we spilled the beans on [Deon Taylor's cringe-worthy Zoom pitch disaster](#)? Well, Jacky Jasper is back with another piping hot serving of Hollywood drama that's sure to leave you shook! If you thought Deon's previous missteps were jaw-dropping, brace yourselves, because this sequel is even more scandalous.

Recap: Deon Taylor, the man behind the cinematic trainwreck "Fear," tried to salvage his reputation with a TV pitch centered around King Bach. But, as we previously highlighted, Taylor's pitch was riddled with inaccuracies and a glaring lack of research. From claiming King Bach rubbed shoulders with Steve Jobs (years after Jobs' passing) to mistakenly dubbing Bach as the "first social media celebrity," Taylor's blunders were nothing short of legendary.

Now, in this follow-up exposé, we're diving into another leaked call, and trust us, it's a doozy. This time, both Deon Taylor and King Bach are in the spotlight, and the revelations are even more shocking. From admissions of past scams to questionable moral compasses, this new chapter in the Deon Taylor saga is a rollercoaster you won't want to miss.

So, grab your favorite snack, settle in, and let's dive deep into the murky waters of Hollywood's behind-the-scenes drama. Ready for round two? Let's get into it! 🎉🍿🎬

From Amateurish Scams to Hollywood Pretense



The dialogue between King Bach, Caleeb Pinkett, Gary Glushon and Deon Taylor kicks off with Deon, attempting to assert his authority, discussing the potential narrative of a show centered around King Bach's life. However, his efforts are overshadowed not just by his lack of eloquence, but also by the shocking revelations that follow. Bach, with a disconcerting ease, confesses to a shadowy past riddled with scams during his college years in Florida. More disturbingly, he admits to still possessing screenshots from that era, treating them as cherished mementos of a time he seems to look back on with fondness.

In an age where celebrities are under relentless scrutiny, Bach's candid confession could be catastrophic for his public image. The modern audience, especially in the era of cancel culture, might find it hard to reconcile with a figure who not only deceived innocent individuals but also appears to reminisce about those days with a sense of pride. Such revelations inevitably raise questions about his moral compass and the foundations upon which his current success stands.

Yet, as heavy as Bach's admissions are, Deon's own contributions to the conversation cannot be overlooked. He paints a vivid picture of an era where everyone he knew was embroiled in some form of scam, from drug dealings to check frauds. Given Deon's extensive record as a defendant, his tales don't come across as mere anecdotes but rather as potential confessions of his own dubious past. His stories, combined with Bach's admissions, paint a troubling picture of two individuals who might have been more deeply entrenched in the world of scams than they'd like to admit. The dialogue not only exposes Bach's questionable past but also hints at Deon's likely involvement in similar activities, raising concerns about the moral fabric of both individuals.



Blurring the Lines Between Scams and Stardom

Deon's attempts to draw parallels between the murky world of scams and the complex intricacies of Hollywood are not only misguided but also reveal a profound lack of understanding. In his muddled perspective, he naively posits that the underhanded tactics of scamming serve as a preparatory school for navigating Hollywood's business dynamics. "It's all the same game," he declares with an air of misplaced confidence, seemingly oblivious to the stark differences between small-time cons and the intricate workings of a multi-billion dollar entertainment industry.



His reverence for iconic figures like Jay-Z and Master P, while undoubtedly sincere, is expressed with such a glaring lack of depth that it verges on the absurd. Deon's insinuations suggest that the monumental success of these entertainment moguls can be traced back to their alleged illicit pasts. Such a claim not only grossly oversimplifies their journey but also undermines their undeniable talents, strategic vision, and unparalleled business acumen. Instead of offering a nuanced appreciation of their achievements, Deon's comments reduce their legacies to mere products of a questionable past, demonstrating his limited grasp on the realities of the entertainment world.



Kevin Hart's Behind-the-Scenes Struggle

First up, let's talk about Kevin Hart. Word on the street (and this leaked call) is that Kevin's itching to step behind the scenes. But Hollywood, with its insatiable greed, won't let him. Why? Because the man's a gold mine on screen! But here's the tea: Kevin's surrounded by a bunch of yes-men who keep shoving him back into the spotlight, even if he's yearning for a change.

Misunderstanding the Power of Social Media

As the conversation meanders towards the transformative power of social media in molding celebrities' public personas, Deon's superficial grasp on the subject becomes glaringly evident. He champions platforms like Instagram as the ultimate panacea for celebrities to masterfully dictate their public narratives. In a particularly ill-advised example, he references R. Kelly, suggesting that a robust Instagram presence could have miraculously swayed the public's overwhelmingly negative perception of the singer. Such a claim not only reveals Deon's naiveté but also grossly trivializes the severity and magnitude of the allegations against R. Kelly.

Bach, undeniably a digital native and a testament to the meteoric rise one can achieve through social media, appears to indulge Deon's oversimplified views, possibly out of courtesy or to avoid confrontation. Yet, the chasm between Bach's intricate comprehension of the digital landscape and Deon's cursory, almost childlike interpretation is palpable. Deon's comments paint a picture of someone struggling to keep pace with the rapidly evolving world of social media and its profound impact on modern celebrity.

Conclusion

In the revealing dialogue, the glaring immaturity and lack of moral compass of both Deon and Bach come to the forefront. Deon, with his misguided attempts to equate petty scams with the intricacies of Hollywood, showcases a troubling naivety. His casual reminiscing about a time when everyone he knew was involved in scams, combined with his admiration for celebrities based on rumored illicit activities, paints a picture of someone who not only misunderstands the entertainment industry but also lacks a basic moral grounding.

Bach's candid admission of his past as a scammer is even more alarming. Rather than expressing remorse or understanding the gravity of his actions, he seems almost nostalgic, even going so far as to mention that he still has "screenshots" from his scamming days. This fascination with his illicit acts, coupled with Deon's misguided admiration, is a stark reminder of the dangers of glorifying criminal behavior. The conversation serves as a testament to the immaturity and moral bankruptcy that can sometimes lurk behind the glitz and glamour of Hollywood.

Exhibit M:

IN LEAKED AUDIO CALEEB PINKETT REVEALS: WILL SMITH & KEVIN HART'S HOLLYWOOD POWER DYNAMICS

By **Jacky Jasper** - Sep 29, 2023



Hey, HSK fam! Jacky Jasper back at it again with another piping hot scoop, and trust me, this one's a revealing! Remember that [infamous Zoom leak with Deon Taylor](#)? Well, the plot thickens as we dive deeper into the conversation that also featured Jada Pinkett Smith's brother, Caleeb, and the determined King Bach.

Will Smith's Hollywood Hustle

Now, onto the Fresh Prince himself. Caleeb Pinkett (yep Jada's brother and integral part of the Will Smith team), dropped some major tea about his superstar brother-in-law, Will Smith. It seems Will's been feeling the pressure of Hollywood's big bucks. While he's been eager to step behind the camera, the industry's clear message is: "Uh, no, nigga, you get 30 million to star, but a mere 5 million to direct." The allure of those dollar signs is hard to resist, especially when it's tied to your lifestyle. But Caleeb's revelations hint at a deeper struggle for Will, a desire to evolve in the industry, even if it means earning less.

The Realities of Showbiz

The conversation paints a vivid picture of the harsh realities of Hollywood. It's not just about talent or passion; it's about the money. As Deon and Caleeb discuss, the industry's decisions are driven by profit, even if it means sidelining an artist's true desires. And while the world sees the glamour and success of stars like Kevin Hart and Will Smith, behind the scenes, they grapple with the same challenges and dilemmas as any artist.

In Conclusion

This leaked conversation is yet another testament to the cutthroat world of Hollywood. While the glitz and glamour are blinding, the struggles, politics, and power plays behind the scenes are all too real. From Kevin Hart's suppressed ambitions to Will Smith's financial dilemmas, the dialogue offers a rare glimpse into the personal and professional challenges faced by Hollywood's elite. And as always, HSK is here to serve it all up, raw and unfiltered. Stay tuned for more juicy scoops and insider stories! 🔥🍿

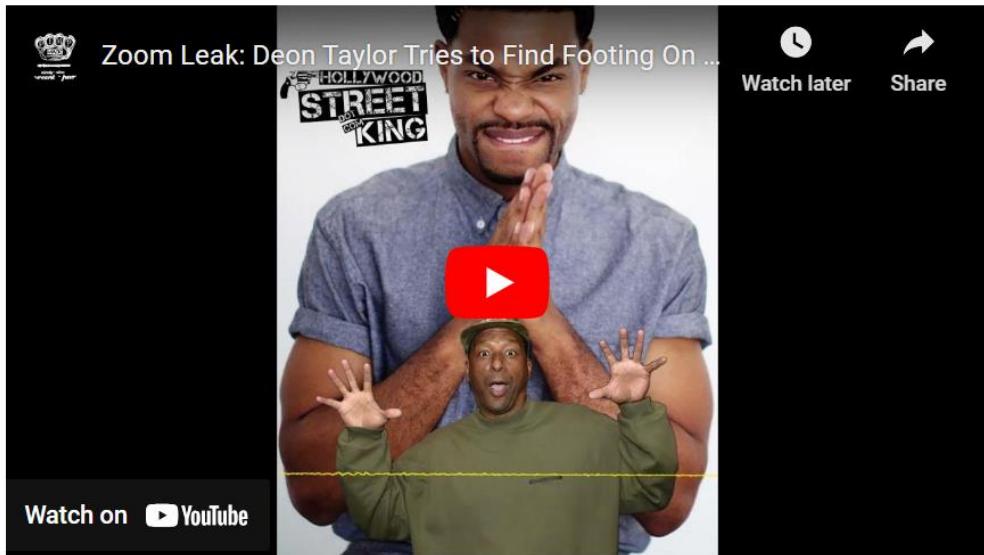


Exhibit N:

DEON TAYLOR'S WILD R. KELLY INSTAGRAM THEORY – PEDOPHILIA POPULISM?

By Marc Rippin - Oct 2, 2023



HSK fam! It's your boy, Jacky Jasper, back with another sizzling scoop that's gonna make your jaw drop. Remember that [notorious Zoom leak with Deon Taylor](#)? Well, just when you thought it couldn't get any crazier, Deon drops a bombshell theory about R. Kelly that's got everyone scratching their heads.



The Good Ol' Days of Hollywood Secrecy

The clip kicks off with Bach reminiscing about the days when Hollywood was shrouded in mystery. You know, the era when celebs could party hard at the Playboy Mansion with the likes of Bill Cosby and Hugh Hefner, and their wild antics would remain hush-hush for decades. The golden age of Hollywood discretion!

Deon's Bizarre R. Kelly Theory

But then, Deon, in a moment of what can only be described as sheer delusion, suggests that social media, particularly Instagram, could've been R. Kelly's saving grace. Hold up, what?! According to Deon's wild theory, if R. Kelly had an Instagram account during his tumultuous legal battles, he could've used it to "combat everything that happened to him." Yeah, because an Instagram account is totally the antidote to a slew of heinous criminal charges, right?

Bach, the voice of reason here, quickly retorts that R. Kelly would've probably been suspended faster than Boosie if he'd been on Instagram, given the nature of the allegations against him. But Deon, undeterred, doubles down on his theory, suggesting that R. Kelly could've used the platform to rally support, much like Jussie Smollett did during his own scandal.

The Power of Social Media – Misunderstood?

While there's no denying the influence of social media in shaping public perception, Deon's assertion is a stark reminder of the dangers of oversimplifying its power. To suggest that an Instagram account could've swayed public opinion in the face of grave allegations against R. Kelly is not only naive but also deeply problematic.

In Conclusion

This latest revelation from the leaked Zoom call further cements Deon Taylor's reputation as someone who, despite being in the entertainment industry, seems to have a skewed understanding of the real world. While social media is a powerful tool, it's not a magic wand that can erase serious allegations or change the course of legal proceedings. As always, HSK is here to give you the unfiltered truth, no matter how wild it gets. Stay tuned, fam! 🎉🍿🎬

Exhibit O:

INSIDE THE ZOOM LEAK: WILL SMITH'S RACE TO OUTSHINE THE ROCK & KEVIN HART

By [Jacky Jasper](#) - Oct 3, 2023



Hollywood Street King Exclusive

HSK fam! It's Jacky Jasper, back with another drop. Remember that [notorious Zoom leak with Deon Taylor](#)? Well, we've got more juice from that very call, and this time, it's all about the Fresh Prince himself, Will Smith, and his burning envy for The Rock and Kevin Hart. Let's dive in!

Will's Social Media Envy

In a candid conversation between Deon Taylor, Jada Pinkett Smith's brother Caleb, and King Bach, we get a peek into the competitive psyche of Will Smith. According to the insiders, Will's decision to jump onto the social media bandwagon wasn't just a casual move. It was fueled by the rising dominance of Kevin Hart and The Rock in the digital space. Will, feeling left out and perhaps a tad overshadowed, saw these two giants capitalizing on the social media wave and wanted in!

The Rock's Stardom: A Thorn in Will's Side?

The Rock's meteoric rise as a movie star seemed to have hit a nerve with Will. "What the f***ing Rock? Are you kidding me?" he reportedly exclaimed, unable to fathom The Rock's soaring popularity. It's clear that the Fresh Prince wasn't too pleased about being outshined. And when you're used to being Hollywood royalty, seeing someone else take the throne can be a tough pill to swallow.

The Birth of Westbrook

But here's where it gets even juicier. Will's entry into the world of social media wasn't just about posting selfies or sharing behind-the-scenes moments. It was a calculated move, a mission. He wanted to outdo Kevin and The Rock at their own game. Enter Westbrook, Will's media company. Hiring a team of tech-savvy creatives, Will's directive was clear: "I want it to be better than anything Kevin and The Rock do." Talk about setting the bar high!

The Great Social Media Debate

The dialogue delved into an intriguing discussion. Someone referred to as "JL" posited to Will that if fans see a star on their phones every day, they won't shell out cash to watch their films. On the flip side, Will argued that if they don't get a daily dose of him, they might just forget him. It's a tug-of-war between traditional Hollywood beliefs and the modern digital era. And while it's still up for debate who's got the right of it, one thing is crystal clear: Will's strategic move into the social media realm has reinvigorated his star power.

In Conclusion

This leaked chat offers a rare glimpse into the competitive world of Hollywood, where even the biggest stars feel the heat. Will Smith's jealousy, his drive to outperform Kevin Hart and The Rock, and the birth of Westbrook are all testaments to the lengths stars will go to stay relevant. And as always, HSK is here to spill the tea, hot and unfiltered. Stay locked in for more Hollywood drama, fam! 🔥🎬🍿

1 PROOF OF SERVICE

2 (CODE CIV. PROC. § 1013A(3))

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18
years and am not a party to the within action; my business address is 1055 West 7th Street, Los
Angeles, CA 90017. My electronic service address is esanders@sandersroberts.com.

6 On January 22, 2024, I served the following document(s) described as **PLAINTIFFS' AND**
CROSS-DEFENDANT ROXANNE TAYLOR'S INITIAL EXPERT WITNESS
DISCLOSURE, F.R.C.P. 26(A)(2) on the interested parties in this action as follows:

8 **JEFFREY S. KRAMER, ESQ.**
9 **SANDRA CALIN, ESQ.**
10 **KRAMER, DEBOER & KEANE**
A Limited Liability Partnership
Including Professional Corporations
11 21860 Burbank Boulevard, Suite 370
Woodland Hills, California 91367
12 Tel: (818) 657-0255
Fax: (818) 657-0256
jkramer@kdeklaw.com
scalin@kdeklaw.com

*Attorneys for Defendants, Darrick Angelone,
AOne Creative, LLC, On Chain Innovations,
LLC*

15 **J. T. FOX, ESQ.**
16 **JUSTIN KIAN, ESQ.**
17 **LAW OFFICES OF JT FOX, APC**
556 S. Fair Oaks Avenue, Suite 444
Pasadena, California 91105
18 Telephone: (888) 750-5530
Fax: (888) 750-5530
jt@jtfoxlaw.com

*Co-Counsel for Defendants, Darrick
Angelone, AOne Creative, LLC, On Chain
Innovations, LLC*

20 **VIA ELECTRONIC MAIL** I caused the documents to be transmitted electronically
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reasonable time after transmission, any email or other indication that the transmission(s)
22 were unsuccessful.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct.

25 Executed on January 22, 2024, at Los Angeles, California.

27 Elizabeth Sanders

28 (Type or print name)


(Signature)